

Schedule of Main Modifications to Merton's Draft Local Plan – 21 September 2022

~~Red strikethrough~~ text indicates a proposed deletion

Red underlined text indicates a proposed addition to the text

Text in *italics* in the Proposed Changes column have a descriptive or instructive function and do not represent text to be retained unchanged.

The page and paragraph numbers are those in the [Stage 3 pre-submission draft Local Plan consulted on 22 July to 6 September \(Ref. 0D1\)](#)

An absent Mod Ref. number in a sequence of numbers represents a former modification that is no longer proposed.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM1.1	14	1 st sentence below sub heading: Identifying Merton's Growth areas	A considerable proportion of Merton's growth up to 2036/ 37 and beyond is, expected to be, delivered in the Opportunity Area (OA). The OA is, designated in the London Plan (Table 2.1 - Opportunity Area Indicative capacity for new homes and jobs). The GLA has agreed that Morden can be included in Merton's OA.	To improve accuracy and ensure soundness by complying with NPPF para. 22, all references and related information are modified to show the 15-year minimum plan period requirement is met by proposing the Plan period to be 2021/22 - 2036/37.	March 2022 – response to Inspectors' preliminary matters September 2022 – response to Stage 2 MIQs
MM1.1a	14	3 rd para under 'Density and mixed uses'	<u>In accordance with the London Plan 2021, tall</u> Faller buildings are one form of high-density development that can be <u>appropriate</u> right in some the locations <u>identified in this plan</u> , subject to excellent design, good public transport accessibility and impact on existing character, heritage and townscape. ...	For clear and consistent use of terminology, replaced 'taller' with 'tall', with regards to buildings, throughout the Plan.	May 2022 – response to Inspectors' Stage 1 matters INSP03 (AM1.9) September 2022 – in

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				Additional Modification AM1.9 changed to be a Main Modification	response to actions arising from Stage 1 Hearings
MM1.1	32	Spatial vision, 1 st sentence	By 2036/ 37 Merton will:	See above - initial MM1.1 at page 14.	March 2022 – response to Inspectors’ preliminary matters
MM1.2	32	Spatial vision, new bullet point.	<ul style="list-style-type: none"> <u>Have protected and improved access to the borough’s Metropolitan Open Land (MOL), parks and open spaces, and have protected and enhanced biodiversity and areas of nature conservation.</u> 	For compliance with national policy and to reflect the environmental Strategic Objectives set out on page 29.	May 2022 – response to Inspectors’ questions.
MM2.1	35	2.1.1	In accordance with Paragraph 149 of the NPPF 2019 and Draft NPPF 2021, ‘Plans should take a proactive approach to ... Paragraph 15 2 3 of the	<p>To improve accuracy and demonstrate the soundness of the Local Plan with regards to the latest NPPF published July 2021.</p> <p>Moved from Additional Modification AM2.2 to Main Modifications in response to Inspectors’ Preliminary Letter March 2022</p>	March 2022 – response to Inspectors’ preliminary matters

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM1.1	37	2.1.11	<p>Current housing projections for Merton indicate that a minimum of 11,374 additional homes will be built during the plan period around 29,000 new dwellings could be built in Merton between 2021 and 2050. Policy must therefore ensure that new development in Merton does not create a legacy of poor performance that will require remedial action in the future and add to Merton's retrofit burden. In their Climate Emergency Design Guide (2020), the London Energy Transformation Initiative (LETI) concluded that all new buildings will need to operate at net-zero carbon by 2030 in order to achieve a zero carbon built environment in the UK by 2050. This means that all new buildings must be designed to operate at net-zero carbon by 2025.</p> <p>Footnote 2 - Refer to Policy H11.2. Based on sites identified to be delivered during the 15 year plan period and an assumed delivery of the Intend to Publish London Plan 2021 target for Merton of 918 new dwellings per year for the remaining 15 years to 2050. See Housing policies for further details.</p>	See above - initial MM1.1 at page 14.	March 2022 – response to Inspectors' preliminary matters
MM2.1a	42	Policy CC2.2 Minimising Greenhouse Gas Emissions	<p>Minimising Greenhouse Gas Emissions</p> <p>We will require all proposed All development within the borough <u>should seek to demonstrate that the fullest contribution to minimising</u> greenhouse gas emissions has been made on site. This will be achieved by requiring:</p> <p>All development:</p> <p><u>We will require:</u></p> <p><u>All development resulting in the creation of 1 or more dwellings or 500sqm or more non-residential GIA:</u></p> <p>a. To reduce greenhouse gas emissions on-site and minimise both annual and peak energy demand in accordance with the Mayor of London's Energy Hierarchy below, or in line with any future locally derived methodology (AM2.5):</p>	Modified to clarify and improve the effectiveness of the policy, in response to the Inspector's Matters Issues and Questions.	May 2022 – response to the Inspector's MIQs

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			<ul style="list-style-type: none"> i. Be lean: use less energy and manage demand during operation ii. Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly iii. Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site iv. Be seen: monitor, verify and report on energy performance <p>All development resulting in the creation of 1 or more dwellings or 500sqm or more non-residential GIA:</p>		
MM2.2	42	Policy CC2.2 Minimising Greenhouse Gas Emissions, part b	To provide an energy statement demonstrating how emissions savings have been maximised at each stage of the energy hierarchy towards achieving net-zero carbon emissions on site in accordance with the relevant guidance.	To ensure that the policy is justified and legally sound, all policy requirements to conform to guidance have been removed or amended.	March 2022 – response to Inspectors’ preliminary matters
MM2.2c	43	Policy CC2.2 Minimising Greenhouse Gas Emissions, part e(ii)	<p>off-site provided that an alternative proposal <u>which offers Additionality*</u> is identified, delivery is certain and subject to agreement with the council.</p> <p>*NEW FOOTNOTE: See Glossary for definition of Additionality</p>	<p>To improve clarity and general conformity with the London Plan in response to Inspectors’ action arising from Stage 1 Hearings.</p> <p>A definition for ‘Additionality’ has also been added to the Glossary.</p>	September 2022 – in response to actions arising from Stage 1 Hearings

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM2.2a	43	Footnote 3	This represents a minimum improvement beyond Part L of Building Regulations 2013. When Building Regulations are updated we will seek to apply <u>publish</u> an equivalent standard against the new Building Regulations.	To improve clarity in response to the Inspector's Matters Issues and Questions.	May 2022 – response to the Inspector's MIQs
MM2.1a	44	2.2.1	In line with the London Plan, all developments in Merton should <u>are required to</u> maximise on-site carbon savings in accordance with the Mayor of London's energy hierarchy through energy efficiency, the use of clean energy, and on-site renewable energy generation.	To clarify and improve the effectiveness of the policy, in response to the Inspector's Matters Issues and Questions.	May 2022 – response to the Inspector's MIQs
MM2.2c	44	2.2.5	This means that any carbon shortfall ⁸ will need to be offset via <u>offsite projects which offer Additionality</u> renewable energy generation offsite or via cash-in-lieu contributions.	See above - initial MM2.2c at Page 43	September 2022 – in response to actions arising from Stage 1 Hearings
MM2.2a	46	2.2.8	This net-zero carbon target will <u>may need to</u> be reviewed as and when <u>if</u> national and regional policy changes (e.g. updates to Building Regulations expected in 2023 and 2025 and any updates to the London Plan), and as part of the Local Plan review in 5 years <u>if the Mayor were to adopt a change in approach to include both regulated and unregulated emissions within their net-zero carbon target, to address the shortfalls highlighted above</u>). <u>If this were to result in a substantial change, this would be considered as part of the local plan review process.</u>	To improve clarity in response to the Inspector's Matters Issues and Questions. This major modification supersedes additional modification AM2.5a.	May 2022 – response to the Inspector's MIQs

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM2.2c	47	2.2.13	For new build development, offsetting any carbon shortfall via cash-in-lieu contributions or via offsite <u>renewable energy generation projects</u> will only be considered where the council is satisfied that on-site savings have been maximised. <u>Proposals for off-site projects should have carbon equivalence to the carbon shortfall on-site. Off-site projects should offer Additionality, and monitoring and verification measures would be expected.</u>	See above - initial MM2.2c at Page 43	September 2022 – in response to actions arising from Stage 1 Hearings
MM2.2b	48	2.2.17	In order to incentivise developers to implement lower carbon strategies on site where possible, and to ensure that any remaining carbon shortfall can adequately be addressed off site, the carbon shortfall for the assumed life of a development (e.g. 30 years) will therefore be offset at a rate of £300/t as at 2021. The price for offsetting carbon is regularly reviewed; <u>this will be monitored and, if necessary, updated. Any changes to Merton’s suggested carbon offset price will be updated in future guidance.</u>	To improve clarity in response to the Inspector’s MIQs.	May 2022 – response to the Inspector’s MIQs
MM2.2	51	Climate Change CC2.3 Minimising Energy Use, part e	From <u>01 January</u> 2025, to meet the <u>following</u> maximum Energy Use Intensity targets as set out in the relevant guidance : <ul style="list-style-type: none"> o <u>Residential – 35 kWh/m2/yr</u> o <u>Offices – 55 kWh/m2/yr</u> o <u>Schools – 65 kWh/m2/yr</u> o <u>Multi-residential (e.g. student accommodation) – 35 kWh/m2/yr</u> o <u>Retail – 55 kWh/m2/yr</u> o <u>Leisure – 100 kWh/m2/yr</u> o <u>Higher education teaching facilities – 55 kWh/m2/yr</u> o <u>Light industrial uses – 110 kWh/m2/yr</u> o <u>GP surgery – 55 kWh/m2/yr</u> o <u>Hotel – 55 kWh/m2/yr</u> 	See above - initial MM2.2 at Page 42 Specific Energy Use Intensity targets were added instead based on new evidence commissioned by Greater Cambridge Shared Planning.	March 2022 – response to Inspectors’ preliminary matters

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM2.2	56	2.3.22 and new paragraph	<p>Merton Council expects all new development to make reasonable endeavours to achieve these EUI and space heating demand targets to future-proof their development and lead the way in decarbonising Merton until EUI targets are required through national regulations or a locally derived methodology. Merton Council will enforce EUI targets from 2025; these targets will be confirmed in relevant guidance closer to the time in order to consider the latest evidence and technologies. In 2021, Etude carried out a feasibility study [25] to inform the <u>Net Zero Carbon Evidence Base for the Greater Cambridge Local Plan [26] which identified the following Energy Use Intensity targets for a range of development types:</u></p> <ul style="list-style-type: none"> • <u>Residential – 35 kWh/m2/yr</u> • <u>Offices – 55 kWh/m2/yr</u> • <u>Schools – 65 kWh/m2/yr</u> • <u>Multi-residential (e.g. student accommodation) – 35 kWh/m2/yr</u> • <u>Retail – 55 kWh/m2/yr</u> • <u>Leisure – 100 kWh/m2/yr</u> • <u>Higher education teaching facilities – 55 kWh/m2/yr</u> • <u>Light industrial uses – 110 kWh/m2/yr</u> • <u>GP surgery – 55 kWh/m2/yr</u> • <u>Hotel – 55 kWh/m2/yr</u> <p><u>New Paragraph - Merton Council expects all new development to make reasonable endeavours to achieve these EUI and space heating demand targets to reduce fuel bills for future occupants and help tackle fuel poverty in Merton, and to future-proof their development and lead the way in decarbonising Merton. These targets, or subsequently adopted targets, will be enforced from January 2025.</u></p>	<p>See above - initial MM2.2 at Page 51 Plan Ref. Policy CC2.3, part e.</p> <p>New references also added to the Bibliography on page 73 of the Local Plan and to the Examination Library to support these new targets.</p> <p><i>(Please note, the addition of these new references within the Climate Change Chapter Bibliography will have changed the numbering of subsequent references)</i></p>	March 2022 – response to Inspectors' preliminary matters

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			<p>[25] Bioregional, Etude, Currie & Brown, "Greater Cambridge Local Plan: Net Zero Carbon Evidence Base. Task D - Technical Feasibility," May 2021. [Online]. Available: Feasibility study</p> <p>[26] Bioregional, Etude, Currie & Brown, Mode, "Greater Cambridge Net Zero Carbon Evidence Base Non-technical summary," August 2021. [Online]. Available:</p>		
MM2.2d	57	Policy CC2.4 Low Carbon Energy, part a	All new development to use low carbon heat. There can be no gas boilers in new dwellings or new non-domestic residential development in Merton from January 2023.	Modified to clarify and improve the effectiveness of the policy in response to the Inspector's actions arising from Stage 1 Hearings	September 2022 – in response to actions arising from Stage 1 Hearings
MM2.2d	59	2.4.7	In order to drive the decarbonisation of heat in Merton and minimise the retrofit burden, Merton Council requires all new development to use low carbon heat efficiently. Any development that proposes to use gas-powered systems will need to provide robust justification to satisfy Merton Council that low or zero carbon systems cannot be used, to set out how the development has been future-proofed to achieve net-zero carbon by 2050, and to demonstrate that the gas-powered system is credibly being used as a stepping stone towards this objective. No gas boilers can be	See above - initial MM2.2d at Page 57	September 2022 – in response to actions arising from Stage 1 Hearings

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			installed in new dwellings or new non-domestic residential development from January 2023.		
MM2.2e	61	New paragraph below 2.4.14	<u>Where heat pumps are proposed developers will also need to ensure that living conditions of existing and future occupiers of the proposed development and neighbouring properties are not unduly diminished from visual intrusion, noise or vibrations in line with Design Policies D12.3 (g) and D12.4 (g), and Pollution Policy P15.10.</u>	<p>Added to clarify the requirement to provide careful consideration to impacts on amenity from the installation of heat pumps and to ensure that the Plan is justified.</p> <p>This modification was moved from the Additional Modification table (originally AM2.9a) to the Main Modifications table in response to Inspectors' action arising from the Stage 1 Hearings.</p>	<p>May 2022 – response to Inspector's Matters, Issues and Questions.</p> <p>September 2022 – in response to actions arising from Stage 1 Hearings</p>
MM2.3	64	Policy CC2.5 (a-d)	<p>Minimising Waste and Promoting a Circular Economy</p> <p>Merton Council will require all<u>All</u> development proposals to should adopt a circular economy approach to building design and construction, <u>and be designed for durability, flexibility and easy disassembly</u>, to reduce waste, to keep materials and products in use for as long as possible, and to minimise embodied carbon. This will be achieved by requiring:</p>	Modified to clarify and improve the effectiveness of the policy, in response to the Inspector's	May 2022 – in response to the Inspector's Matters, Issues & Questions.


Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			<p>All development:</p> <p>a. Where existing buildings are on site, to prioritise the ir reuse and retrofit of existing buildings wherever possible before considering the design of new buildings.</p> <p>b. To be designed for durability and flexibility as well as easy disassembly and reuse to minimise waste during the ‘in-use’ and ‘end of life’ phases of the development. Building shape and form should be designed to minimise embodied carbon and limit the need for repair and replacement.</p> <p>c. To ensure resource efficiency and reduce embodied carbon emissions by sourcing and prioritising materials that can easily be maintained, repaired and renewed across the development lifetime. <u>Building shape and form should be designed to minimise embodied carbon and limit the need for repair and replacement.</u></p> <p>d. To minimise the environmental impact of materials by specifying sustainably-sourced, low impact and re-used or recycled materials; this should include identifying opportunities for the retention and reuse of existing materials on site (e.g. re-using demolition material on site). Materials should be locally-sourced wherever possible to minimise transport emissions.</p>	<p>Matters Issues and Questions.</p> <p>Modified to improve clarity in response to Inspectors’ action arising from the Stage 1 Hearings.</p>	<p>September 2022 – in response to actions arising from Stage 1 Hearings</p>
MM2.4	64	Policy CC2.5 (e)	<p>e. To undertake a Whole Life-Cycle Carbon assessment proportionate to the scale of development and demonstrate that whole life-cycle carbon savings have been maximised <u>actions taken to reduce life-cycle carbon emissions.</u></p>	<p>Modified to clarify and improve the effectiveness of the policy, in response to the Inspector’s Matters Issues and Questions.</p>	<p>May 2022 – in response to the Inspector’s Matters, Issues & Questions.</p>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM3.1	81	Colliers Wood: Policy N3.1, New part after f	<u>Supporting tall buildings within Colliers Wood town centre in accordance with the details in the Strategic Heights Diagram for Colliers Wood town centre and the requirements in Policy D12.6 Tall Buildings.</u>	<p>To be in general conformity with London Plan Policy D9 Tall Buildings, with particular reference to part B1, the policy D12.6 Tall building now specifies where tall buildings will be acceptable. Strategic Heights Diagrams have been introduced to show specific locations that are appropriate for tall buildings. The Strategic Height Diagrams provide a range of appropriate heights on the specific town centre locations.</p> <p>Colliers Wood Policy N3.1, Morden Policy N5.1 and Wimbledon Policy N9.1 now specify that tall buildings will only be</p>	November 2021 – for submission

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				supported when they are accordance with the details in the relevant Strategic Heights Diagrams and the policy D12.6. These changes have been developed in consultation GLA officers, following the Mayor of London's Stage 3 response.	
MM2.1	84	3.1.10	In this circumstance, we would not be able to encourage new town centre uses in Colliers Wood as supporting large "out of centre" shops, offices and leisure development is contrary to the NPPF (National Planning Policy Framework) 2019 <u>2021</u> (chapter 7), the London Plan and Merton's own planning policies.	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors' preliminary matters
MM3.1a	89	Site Allocation CW1, Design and accessibility guidance	Development proposals must incorporate the recommendations of Merton's Strategic Flood Risk Assessment (SFRA). <u>Development proposals must have regard to both level 1 and level 2 of Merton's Strategic Flood Risk Assessment (SFRA). For this site allocation, development proposals must incorporate the site-specific recommendations on managing and mitigating flood risk from all sources, including the suitability of sustainable drainage systems (SuDS). These can be found in the SFRA level 2 in Appendix A.</u>	Modification to ensure that the Plan is justified and effective and ensure applicants have due consideration to the mitigation requirements within the SFRA	September 2022 – in response to actions arising from Stage 1 Hearings
MM3.1a	92	Site Allocation CW2,	<u>Development proposals must have regard to both level 1 and level 2 of Merton's Strategic Flood Risk Assessment (SFRA). For this site allocation, development proposals must incorporate the site-specific recommendations on managing and</u>	See above - initial MM3.1a at Page 89	September 2022 – in response to

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
		Design and accessibility guidance	mitigating flood risk from all sources, including the suitability of sustainable drainage systems (SuDS). These can be found in the SFRA level 2 in Appendix A. Development proposals will need to regard to incorporate all the site-specific flood mitigation recommendations in the associated with the site and surrounding area. A sequential approach should be applied within the site, steering development towards those areas where the hazard rating is lower and at lower risk of surface water flooding.		actions arising from Stage 1 Hearings
MM1.1a	93	Site Allocation CW2, Approach to tall buildings	A mixed-use redevelopment within the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape and based on the principle of the existing Britannia Point being the pinnacle height of a family of buildings of varying height, forming a coherent cluster that enhances the wider Colliers Wood area.	See above - initial MM1.1a at Page 14	September 2022 – in response to actions arising from Stage 1 Hearings
MM3.2	93	Site Allocation CW2, Approach to tall buildings, new paragraph below existing paragraph	The Strategic Heights Diagram for the Colliers Wood Town Centre, in D12.6 'Tall buildings', sets out the height limits for this. However, all building heights will be subject to consideration of impacts on existing character, heritage and townscape in accordance with policies D12.3 'Ensuring high quality design for all developments', D12.5 'Managing heritage assets' and D12.6 'Tall buildings'	For further clarity on building heights and general conformity with the London Plan Policy.	May 2022 – response to Inspectors' Stage 1 matters INSP03
MM3.1a	96	Site Allocation CW3, Design and accessibility guidance	The proposed use of the site is compatible with the flood zone therefore the Exception Test is not needed. Development proposals must have regard to both level 1 and level 2 of Merton's Strategic Flood Risk Assessment (SFRA). For this site allocation, development proposals must incorporate the site-specific recommendations on managing and mitigating flood risk from all sources, including the suitability of sustainable drainage systems (SuDS). These can be found in the SFRA level 2 in Appendix A. However, several site-specific recommendations are made in the Merton's Strategic Flood Risk Assessment (SFRA) which must be incorporated in development proposals. Development proposals must include sustainable drainage measures.	See above - initial MM3.1a at Page 89	September 2022 – in response to actions arising from Stage 1 Hearings
MM3.2a	96	Site Allocation CW3, Infrastructur	The developer should contact SGN (Southern Gas Networks) to discuss requirements for any improvements to the gas infrastructure network.	For factual correctness, to improve clarity in site allocations	September 2022 – in response to Stage 2 MIQs

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
		e Requiremen ts		and for effectiveness.	
MM3.2b	96	Site Allocation CW3, Infrastructur e Requiremen ts	This site is located in an area identified as being deficient in access to children's play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.	To ensure the plan is justified and that the infrastructure requirements set out in the Site Allocation are clear.	September 2022 – in response to Stage 2 MIQs.
MM3.1a	99	Site Allocation CW4, Design and accessibility guidance	Development will need to incorporate flood management measures as set out in Merton's Strategic Flood Risk Assessment within the design and layout to ensure the operation of this critical infrastructure (the station) and surrounding buildings. The station is classified as critical infrastructure therefore development proposals must incorporate sustainable drainage measures. The proposed use for the site is mixed-use including residential which is defined as More Vulnerable (which is allowed in Flood Zone 2). The Exception Test is not needed; <u>however development proposals must have regard to both level 1 and level 2 of Merton's Strategic Flood Risk Assessment (SFRA). For this site allocation, development proposals must incorporate the site-specific recommendations on managing and mitigating flood risk from all sources, including the suitability of sustainable drainage systems (SuDS). These can be found in the SFRA level 2 in Appendix A however, development proposals must incorporate the recommendations of Merton Strategic Floor Risk Assessment for this site and surrounding area.</u>	See above - initial MM3.1a at Page 89	September 2022 – in response to actions arising from Stage 1 Hearings
MM3.2b	101	Site Allocation CW5, site map	(Map replaced with the following:)	To clearly show the Metropolitan Open Land on, and adjacent to, the site, to improve clarity and effectiveness.	September 2022 – in response to actions arising from Stage 1 Hearings

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			 <p>The map shows a site allocation (grey) labeled CW5. To its west is a green area labeled 'Metropolitan Open Land (MOL)'. A stream labeled 'Pickle Ditch' flows through the MOL area. Surrounding streets include 'n Street', 'Priory Road', and 'Water W'. A 'market' is also indicated. A legend in the top right corner identifies 'Site Allocation' (grey) and 'Metropolitan Open Land (MOL)' (green). The Merton Council logo is in the bottom right. Text at the bottom left reads: 'Contains OS data © Crown copyright [and database rights](2021)OS(100019259)'.</p>		
MM3.3	102	Site Allocation CW5, Design and accessibility guidance	<p>Opportunity to improve connectivity across Colliers Wood and improve the condition of the Pickle Ditch. <u>Development proposals must protect and enhance the Wandle Valley Metropolitan Open Land (MOL) along the western boundary of the site, in accordance with the Green Infrastructure policies set out in Chapter 15.</u></p>	For clarity and accuracy and to maintain consistency with London Plan and National Policy.	May 2022 – response to Inspectors’ MIQ.
MM3.1a	102	Site Allocation CW5, Design and accessibility guidance	<p>Development proposals must incorporate sustainable drainage measures to address the issue associated with the location within a flood zone and other flooding issues. Development proposal will need to incorporate all the recommendations in the Merton’s Strategic Flood Risk Assessment associated with the site and surrounding area. <u>Development proposals must have regard to both level 1 and level 2 of Merton’s Strategic Flood Risk Assessment (SFRA). For this site allocation, development proposals must incorporate the site-specific recommendations on managing and</u></p>	See above - initial MM3.1a at Page 89	September 2022 – in response to actions arising from Stage 1 Hearings

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			<u>mitigating flood risk from all sources, including the suitability of sustainable drainage systems (SuDS). These can be found in the SFRA level 2 in Appendix A.</u>		
MM3.4	104	Site Allocation CW5, Impacts a designated open space	<u>Yes, the western edge Parts</u> of the site to the south are <u>is</u> Metropolitan Open Land (MOL) and Priory Wall Open Space Walk. The site sits within the Wandle Valley Regional Park 400m buffer. <u>Refer to Appendices for further information on MOL.</u>	For clarity and accuracy.	May 2022 – response to Inspectors’ MIQ.
MM4.1	119	Site Allocation Mi1 Benedict Wharf, Further information	The draft South London Waste Plan 2021-2036 <u>2022-2037</u> which was had two rounds of public consultation (Oct-Dec 2019 and Sep-Oct 2020) and has been submitted to the Sectary of State for an Examination in Public, does not propose the safeguarding of the Benedict Wharf site for waste management purposes.	To improve accuracy and ensure soundness, the plan period for the SLWP has been updated, in line with the current EiP process.	March 2022
MM1.1a	121	Site Allocation Mi1 Benedicts Wharf, Approach to tall buildings	The size of the site allows for a masterplanned approach which could contain taller buildings.	See above - initial MM1.1a at Page 14	September 2022 – in response to actions arising from Stage 1 Hearings
MM3.1	121	Site Allocation Mi1 Benedicts Wharf, Approach to tall buildings	The size of the site allows for a masterplanned approach which could contain taller(MM1.1a) buildings <u>of up to 10 storeys subject to consideration of design policies.</u>	See above – Initial MM3.1 at Page 81 Plan Ref. Policy N3.1 and to add clarity to three site allocations outside town centres (Mi1; Mi16 and RP3)	March 2022 – response to Inspectors’ preliminary matters

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM3.2a	121	Site Allocation Mi1, under Infrastructure Requirements	The developer should contact SGN (Southern Gas Networks) to discuss requirements for any improvements to the gas infrastructure network.	See above - initial MM3.2a at Page 96	September 2022 – in response to Stage 2 MIQ.
MM4.1a	128	Site Allocation Mi3, under Infrastructure Requirements, new paragraph at the end of the part	<u>The developer must consult and engage with the Metropolitan Police Service (MPS) on any development proposals to prevent future development from adversely affecting the MPS's operational facilities. The Council will also engage to seek advice from the MPS during any pre or planning application processes.</u>	For effectiveness, following comments received by MPS.	September 2022.
MM3.2a	130	Site Allocation Mi4, under Infrastructure Requirements	The developer should contact SGN (Southern Gas Networks) to discuss requirements for any improvements to the gas infrastructure network.	See above - initial MM3.2a at Page 96	September 2022 – in response to Stage 2 MIQ.
MM4.2	146	Site Allocation Mi11 Raleigh Gardens car park, Approach to tall buildings	Approach to tall buildings: Development of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.	Site allocation removed from a site appropriate for tall buildings at Stage 3 (Reg 19). This text remained by accident.	May 2022 – response to Inspectors' Stage 1 matters INSP03
MM3.2b	152	Site Allocation Mi13, Infrastructure	This site is located in an area identified as being deficient in access to children's play space for ages 0-4 years. The council will require on-site provision in accordance with the infrastructure policies and London Plan.	To ensure the plan is justified and that the infrastructure requirements set out in the Site	September 2022 – response to Stage 2 MIQs.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
		Requirements		Allocation are clear.	
MM3.2b	157	Site Allocation Mi15, Infrastructure Requirements	<p>This site is located in an area identified as being deficient in access to public open space. The council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.</p> <p>This site is located in an area identified as being deficient in access to children's play space for ages 0-4 years. The council will require on site provision in accordance with the infrastructure policies and London Plan.</p>	To ensure the plan is justified and that the infrastructure requirements set out in the Site Allocation are clear.	September 2022 – response to Stage 2 MIQs.
MM4.3	159, 161	Site Allocation Mi16 Mitcham Gasworks Western Road, Indicative site capacity (p 159), Approach to tall buildings (p161)	<p>Design and accessibility guidance: The site had outline planning permission for a major residential and employment scheme. The residential element has been delivered over 5 years ago (Hay Drive etc). However, the employment part of the permission (which extended onto the site surrounded by the red line, reaching Western Road) lapsed in July 2012. The site's potential uses, and layout is currently constrained by the gasholder that stood on the corner of Western Road and Portland Road was demolished in early 2022. Although the gasholder is no longer used, it has not been officially decommissioned. The landowners are proposing it decommission but until that time development within the vicinity of the gasholder is currently subject to restrictions set out in the Health and Safety Executive's land use planning method (PADHI) which limits the potential for residential-led mixed use development until the gasholder is decommissioned.</p> <p>The site is subject to a Hazardous Substance Consent (HSC). An application for the continuation of this HSC was granted in 2002 (Ref: 02/P1493). The decommissioning the site and the cancellation of the HSC requirements to enable the redevelopment of the site. The site accommodates two electricity sub stations, an operational gas Pressure Reduction Station (PRS) and above ground gas mains stemming from the historic installation use. A 65metre large redundant gasholder and telecoms mast are found to the north of the site on the SGN (Southern Gas Networks) owned land. The site would require decontamination due to its earlier use.</p> <p>Indicative site capacity: 200-400 <u>450- 650</u> new homes</p>	To ensure the plan is justified and in response to the Statement of Common Ground with St William.	September 2022

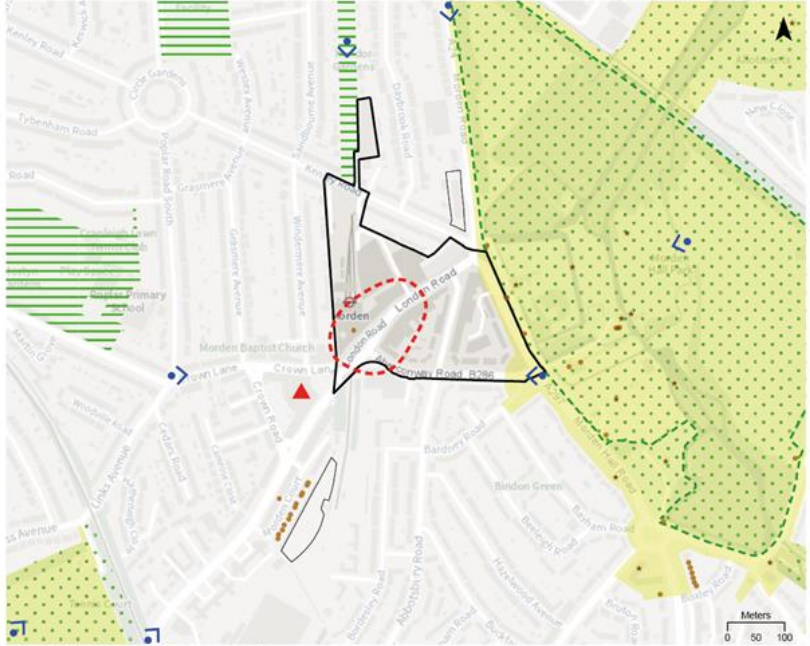












Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			<p>Approach to tall buildings A mixed-use redevelopment of the site could include taller buildings <u>of up to 9 storeys along with a replacement telecoms mast on top of the tallest building subject to consideration of impacts on existing character, heritage and townscape in accordance with policies D12.3 'Ensuring high quality design for all developments' and D12.6 'Tall buildings'.</u></p>		
MM3.2a	160	Site Allocation Mi16, under Design and accessibility guidance	A large redundant gasholder and telecoms mast are found to the north of the site on the SGN (Southern Gas Networks) owned land. The site would require decontamination due to its earlier use.	See above - initial MM3.2a at Page 96	September 2022 – in response to Stage 2 MIQs.
MM4.4	163	Site allocation Mi17 under design and accessibility guidance	<p><i>(removal of * as building is Grade II listed only, as stated later on the same page)</i></p> <p>Design and accessibility guidance: ... Development will need to improve the condition of Grade II* listed White Hart public house and support a viable use of the White Hart pub. </p>	To improve accuracy	September 2022 – in response to Stage 2 MIQs
MM5.1	173	Morden: Policy N5.1, KEY OBJECTIVE S: MORDEN	<p>Providing more high quality homes Incorporate Provide new homes in <u>the Morden and in particular, within the Morden Regeneration Zone</u> Wider Morden Town Centre Area with a diverse mix of housing sizes and tenures.</p>	To improve clarity and accuracy of where the majority of new homes will be delivered.	November 2021 – for submission

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				<p>Main Modification MM3.1 results in tall buildings only being supported within the Morden Regeneration Zone (Mo1). The removal of references to the potential appropriateness of tall buildings within some locations in the Wider Morden Town Centre Area (WMTCA), but outside the Morden Regeneration Zone, results in the designation of the WMTCA no longer being justified, as development proposals within this area could be addressed by means of other policies within the draft Local Plan and the London Plan.</p>	

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				<p>All references to the WMTCA are therefore proposed to be removed.</p> <p>As the details of a possible future Opportunity Area Planning Framework are still unknown, it is considered reasonable and justified to include the former WMTCA in the Merton Opportunity Area boundary.</p>	
MM5.1	176	Morden: Policy N5.1 map	<i>Delete map</i>	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	176	Morden: Policy N5.1 text	This will be achieved through the delivery of a co-ordinated, well-designed series of changes to the Wider Morden Town Centre Area which includes include intensification and...	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1d	176	Morden Policy N5.1 text	...intensification and comprehensive development-regeneration within Morden Regeneration Zone...	To improve clarity through the addition of a definition in paragraph 5.1.18 and consistent use of the same phrase, in the policy text, supporting text and the text for	November 2021 – for submission

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				<p>site allocation Mo1, and to ensure that the Plan is positively prepared and justified.</p> <p>Additional Modification AM5.7 changed to be a Main Modification</p>	September 2022 – in response to actions arising from Stage 1 Hearings
MM5.1a	177	Morden: Policy N5.1 part a	<u>Development pP</u> proposals <u>for large sites (0.25 hectares and above)</u> that <u>assist contribute to</u> the delivery of comprehensive regeneration as described in this policy and Site Allocation Mo41(AM5.10), will be supported.	Improve clarity that incremental development proposals on large sites (0.25ha and above) can contribute to the delivery of comprehensive regeneration and to ensure that the Plan is positively prepared and justified.	May 2022
MM5.1	177	Morden: Policy N5.1 part c	Incorporating a range of appropriate public spaces and streets within the Morden Regeneration Zone that enhance accessibility through the Wider Morden Town Centre Area <u>to the surrounding area</u> , with pedestrians and cyclists as the priority.	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	177	Morden: Policy N5.1 part d	Incorporating green infrastructure that contributes to improved drainage, air quality and the creation of green links through the Morden Regeneration Zone and the Wider Morden Town Centre Area , connecting to...	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM3.1	178	Morden: Policy N5.1 part e	Supporting tall buildings within the Morden Regeneration Zone <u>in accordance with the details in the Strategic Heights Diagram for the Morden Regeneration Zone and the requirements in Policy D12.6 Tall Buildings and in limited locations within</u>	See above – Initial MM3.1 at	November 2021 – for submission

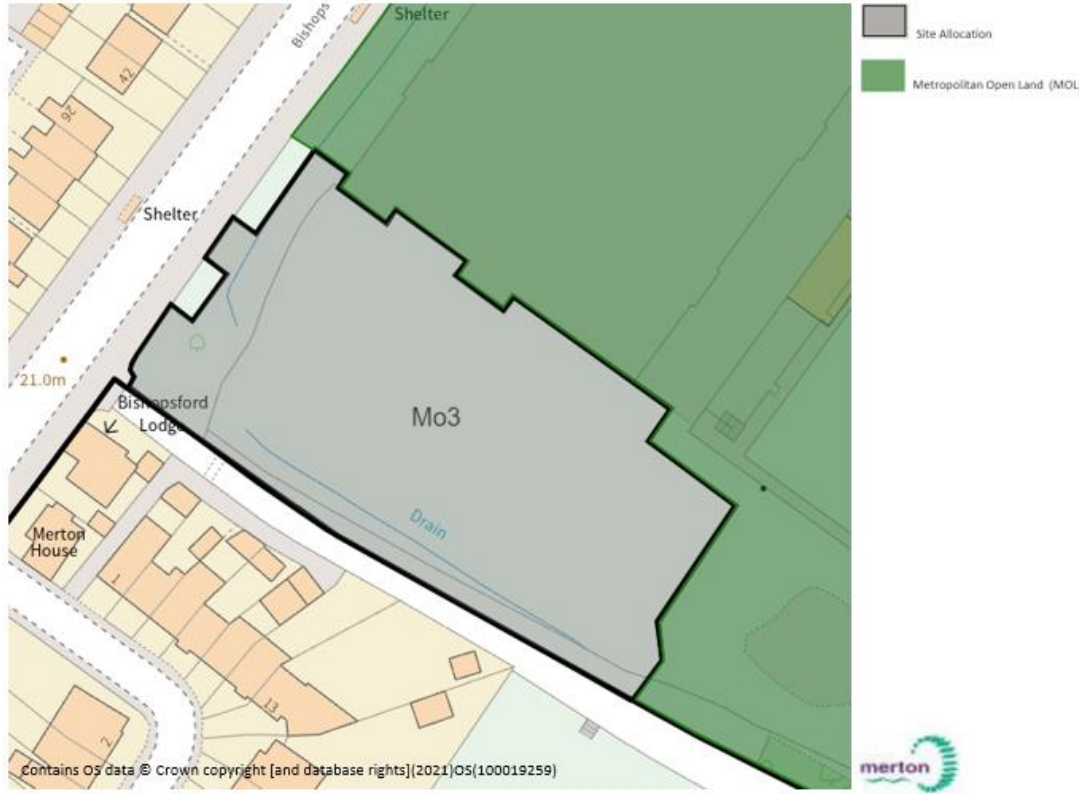
Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			the Wider Morden Town Centre Area, where they are considered appropriate in order to facilitate intensified development. Tall buildings should be located appropriately and relate well to the surrounding context and public realm, particularly at street level. Tall buildings must be informed by comprehensive townscape appraisal and visual assessment	Page 81 Plan Ref. Policy N3.1	
MM5.1	178	Morden: Policy N5.1 part f	Supporting an appropriate mix of retail, office, community and leisure uses, including night time uses, within the Morden Regeneration Zone and the Wider Morden Town Centre Area , which provide an appropriate level of active frontage and do not have an undue impact on neighbouring amenity.	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	178	Morden: Policy N5.1 part h	Supporting incremental site-by-site development outside the Morden Regeneration Zone but within the Wider Morden Town Centre Area, where it: <ul style="list-style-type: none"> • is of a high-quality design, • complements and co-ordinates with the surrounding built form and public realm, • supports the delivery of new homes and complementary town centre uses, and • makes it easier for all to get around and in particular, encourages walking and cycling 	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	178	Morden: Policy N5.1 part i	Ensuring that development within the Morden neighbourhood(AM5.11), which surrounds the Wider Morden Town Centre Area , conserves and enhances its suburban character of terraced and semi-detached homes and abundant green infrastructure.	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	178	Morden: Policy N5.1 part j	Supporting transport improvements within the Morden Neighbourhood, which surrounds the Wider Morden Town Centre Area(MM5.1), such as improvements to the existing tram network and improvements that help enable <u>sustainable and active travel choices(AM5.12a)</u> .	See above - initial MM5.1 at Page 173	November 2021 – for submission

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM3.1	178	Policy N5.1	 <p>Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)</p> <ul style="list-style-type: none">  Morden Regeneration Zone heights range: up to 39m [approx. up to 12 storeys]  Tall building cluster heights range: up to 71m [approx. up to 22 storeys]  Morden Civic Centre approx height: 58m [16 storeys]  Townscape views into town centre  Site allocations  Metropolitan Open Land [MOL]  Open space  Conservation area  Registered parks and gardens  Listed buildings  Locally listed buildings  <p><i>(Insert the diagram after the last policy bullet point)</i></p>	See above – Initial MM3.1 at Page 81 Plan Ref. Policy N3	November 2021 – for submission
MM5.1a	180	New paragraph below 5.1.11	<p><u>Development proposals for large sites (0.25 hectares and above) that come forward to contribute to the delivery of comprehensive regeneration, as stated in</u></p>	See above - initial MM5.1a at Page 177	May 2022

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			<u>Policy N5.1 part a, should have regard to the vision, objectives and principles set out in the SDF.</u>	Further amendments, as discussed at the Stage 1 Hearings, to improve the clarity of the status of the SDF and to ensure that the Plan is positively prepared and justified.	September 2022 – in response to actions arising from Stage 1 Hearings
MM5.1	181	5.1.12	The Wider Morden Town Centre Area <u>Morden town centre</u> is within an Opportunity Area as designated in the London Plan 2021... ...produce an Opportunity Area Planning Framework which will include the significant contribution that the Wider Morden Town Centre Area <u>Morden Regeneration Zone</u> will make towards the Opportunity Area's target to accommodate 5000 new homes and 6000 new jobs.	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1b	182	5.1.18	...There are also multiple other land ownership interests within the Morden Regeneration Zone <u>and landowners are strongly encouraged to work together.</u> and a <u>land assembly strategy</u> will be required to ensure that the <u>comprehensive regeneration of Site allocation Mo1 can be achieved by the end of this local plan period and site can be developed in a comprehensive manner.</u> (AM5.16a)to avoid fragmented development and suboptimal densities in this highly accessible location...	Changes informed by discussions with landowners and proposed to ensure that the plan is positively prepared.	May 2022
MM5.1d	182	5.1.18	There are also multiple other land ownership interests within the Morden Regeneration Zone <u>and landowners are strongly encouraged to work together.</u> (MM5.1b) and a <u>land assembly strategy</u> will be required to ensure that the <u>comprehensive regeneration of Site allocation Mo1 can be achieved by the end of this local plan period and site can be developed in a comprehensive manner.</u> (AM5.16a) to avoid fragmented development and suboptimal densities in this highly accessible location. <u>References to comprehensive regeneration in this policy, refer to the nature and scale of the regeneration and not a delivery method</u> (MM5.1d) <u>and, in accordance with London Plan policies H1 and H2,</u>	See above – Initial MM5.1d at Page 176 Additional Modification AM5.7 changed	September 2022 – in response to actions arising from Stage 1 Hearings

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			<u>references to large sites in this policy refer to sites of 0.25 hectares and above.(MM5.1a)</u>	to be a Main Modification	
MM5.1a	182	5.1.18	... <u>References to comprehensive regeneration in this policy refer to the nature and scale of the regeneration and not a delivery method(MM5.1d) and, in accordance with London Plan policies H1 and H2, references to large sites in this policy refer to sites of 0.25 hectares and above.</u>	See above - initial MM5.1a at Page 177	May 2022
MM5.1	182	5.1.20	The part of the Wider Morden Town Centre Area that is outside the Morden Regeneration Zone, is the area for incremental change, where the design and layout of public realm and streetscape is to be actively co-ordinated by the council, so that the Morden Regeneration Zone sits well within the local context.	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1d	183	5.1.23	One of the key aims of the comprehensive <u>redevelopment regeneration</u> of the Morden Regeneration Zone is to	See above – Initial MM5.1d at Page 176 Additional Modification AM5.7 changed to be a Main Modification	November 2021 – for submission September 2022 – in response to actions arising from Stage 1 Hearings
MM5.1	183	5.1.25	We will continue to work with Transport for London and others to provide good links between the Wider Morden Town Centre Area <u>Morden Town Centre</u> , the tram and the underground.	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	184	5.1.32	The introduction of higher density development <u>and tall buildings(AM5.26)</u> within in the Wider Morden Town Centre Area and in particular within the Morden Regeneration Zone, will...	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	185	5.1.33	Tall buildings that meet the requirements in policy D5 <u>12.6(AM5.27)</u> , are considered appropriate as part of the regeneration <u>to deliver optimised residential development on and intensified use of(AM5.19)</u> the highly accessible land within the Morden Regeneration Zone and in limited locations, were demonstrated to relate well to the surrounding context, on sites within the Wider Morden Town Centre Area that are in close proximity to the Morden Regeneration Zone.	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM3.1	185	5.1.34	<u>The Strategic Heights Diagram for the Morden Regeneration Zone specifies height limits in accordance with the London Plan. The proposed height for each building within the Morden Regeneration Zone will need to be justified in accordance with the criteria in policies D12.3 ‘Ensuring high quality design for all</u>	See above – Initial MM3.1 at Page 81 Plan Ref. Policy N3	November 2021 – for submission

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			<u>developments', D12.5 'Managing heritage assets' and D12.6 'Tall buildings'. The scale of existing buildings...</u>		
MM5.1	185	5.1.34	The scale of existing buildings within in (AM5.28) the suburban Morden Neighbourhood, which surrounds the Wider Morden Town Centre Area, is predominantly two storeys in height and therefore ...	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	185	5.1.36	A plan-led approach will ensure that any tall buildings within the Morden Regeneration Zone are sensitively designed and appropriately located, and on sites within the Wider Morden Town Centre Area that are outside but in close proximity to the Morden Regeneration Zone, we will actively co-ordinate the details of proposed tall buildings on a case by case basis with reference to the numerous criteria in policies D5.1 – D5.6.	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	187	5.1.46	As this site is located within the Wider Morden Town Centre Area, there <u>There</u> may be an opportunity to relocate the health centre elsewhere...	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	188	5.1.50	Development at the perimeter of the Morden Regeneration Zone and the Wider Morden Town Centre Area are to be respectful of these sensitive edges, to ensure neighbouring occupiers are not unduly adversely affected, and that green and blue infrastructure links and active travel links are enhanced.	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1d	189	5.1.60	...has strengthened the potential for Morden to be developed <u>regenerated</u> comprehensively.	See above – Initial MM5.1d at Page 176 Additional Modification AM5.7 changed to be a Main Modification	November 2021 – for submission September 2022 – in response to actions arising from Stage 1 Hearings
MM5.1a	190	New paragraph below 5.1.63	<u>There are large sites that could come forward with development proposals during the lifetime of this Local Plan that can help to achieve the comprehensive regeneration of Site Mo1. Unlike smaller sites, large sites (of 0.25 hectares or more) are of a size that can optimise capacity for Town Centre Type Uses, new homes, and support improvements to the public realm and local infrastructure in line with the requirements in this policy.</u>	See above - initial MM5.1a at Page 177	May 2022
MM5.1b(i)	198	Site Allocation Mo3,	<i>(Map replaced with the following:)</i>	To clearly show the interaction between the Metropolitan	September 2022 - in response to actions arising

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
		(moved) site map		Open Land boundary and the site boundary, to improve clarity and effectiveness. Note that the site boundary has also been updated to reflect the approved planning application 19/P4094.	from Stage 1 Hearings of Merton's Local Plan.
MM5.1c	199	Site allocation Mo3 (moved), Infrastructure Requirements	<p>Any development proposals for this site, is expected to provide urban greening on site and consider its relationship with the Wandle Valley Regional Park in terms of visual, physical and landscape links, ensuring that the development positively enhances accessibility to the park. We will require these details to be shown in a Design and Access Statement or Landscaping Plan submitted with any planning application.</p> <p><u>In accordance with NPPF 142, proposals for this site must also include compensatory improvements to the environmental quality and accessibility of the Wandle Valley MOL, to mitigate against the loss of the MOL on site. The Merton Green Infrastructure Study can be used to identify appropriate landscape, visual and biodiversity enhancements, new green infrastructure and improvements to access to existing recreational and sporting facilities for this site.</u></p>	For clarity and consistency with national policy.	<p>May 2022 - in response to the Inspectors' MIQs.</p> <p>September 2022 – in response to Stage 1 hearing actions.</p>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM5.1d	200	Site Allocation Mo3 (moved), under 'Impacts a designated open space', new paragraph below text	<u>This site will be removed from Metropolitan Open Land (MOL) in this Plan, to align with the approved Planning Application boundary 19/P4094. Refer to the Appendices and Policies Map for further information on MOL.</u>	For clarity and consistency with national policy.	September 2022 – in response to Stage 1 hearing actions.
MM5.2	202	Site Allocation Mo4, Site deliverability	Commencement within 5 years and delivery in phases within 10 5-15 years.	To improve clarity and consistency with other site allocations and to ensure that the site allocation is 'justified'.	November 2021 – for submission May 2022 – in response to the Inspectors' MIQs.
MM5.1	202	Site Allocation Mo4, Morden Regeneration Zone site vision: 4	A range of appropriate public spaces and streets <u>within the Morden Regeneration Zone(AM5.6)</u> that enhance accessibility through the Wider Morden Town Centre Area <u>to the surrounding area</u> , with pedestrians and cyclists as the priority.	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1	202	Site Allocation Mo4, Morden Regeneration Zone site vision: 5	...the creation of green links through the Wider Morden Town Centre Area <u>Morden Regeneration Zone</u> ,...	See above - initial MM5.1 at Page 173	November 2021 – for submission

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM3.1	202	Site Allocation Mo4, Morden Regeneration Zone site vision: 6	The use of tall buildings where appropriate <u>and in accordance with the Strategic Heights Diagram for the Morden Regeneration Zone(MM5.2)</u> in order to optimise development that relates well to the surrounding context and public realm, particularly at street level.	See above – Initial MM3.1 at Page 81 Plan Ref. Policy N3	November 2021 – for submission
MM5.1	202	Site Allocation Mo4, Morden Regeneration Zone site vision: text	While the Morden Regeneration Zone is an individual site allocation, there are also other development opportunities <u>in the Wider Morden Town Centre Area within its proximity</u> , including the following site allocations:...	See above - initial MM5.1 at Page 173	November 2021 – for submission
MM5.1a	202	Site Allocation Mo4, Design and accessibility guidance: new paragraph below the first paragraph	<u>Development proposals for large sites (0.25 hectares and above) such as 34-44 London Road, that contribute to the delivery of comprehensive regeneration, could be brought forward before the end of this local plan period.</u>	See above - initial MM5.1a at Page 177	May 2022
MM3.1	202	Site Allocation Mo4, Design and accessibility guidance: text	In accordance with <u>the Strategic Heights Diagram for the Morden Regeneration Zone a plan-led approach</u> , taller(MM1.1a) buildings would be acceptable in this town centre site, to...	See above – Initial MM3.1 at Page 81 Plan Ref. Policy N3	November 2021 – for submission
MM1.1a	202	Site Allocation Mo4, Design and accessibility	In accordance with <u>the Strategic Heights Diagram for the Morden Regeneration Zone a plan-led approach(MM3.1)</u> , taller buildings would be acceptable in this town centre site, to...	See above - initial MM1.1a at Page 14	September 2022 – in response to actions arising from Stage 1 Hearings

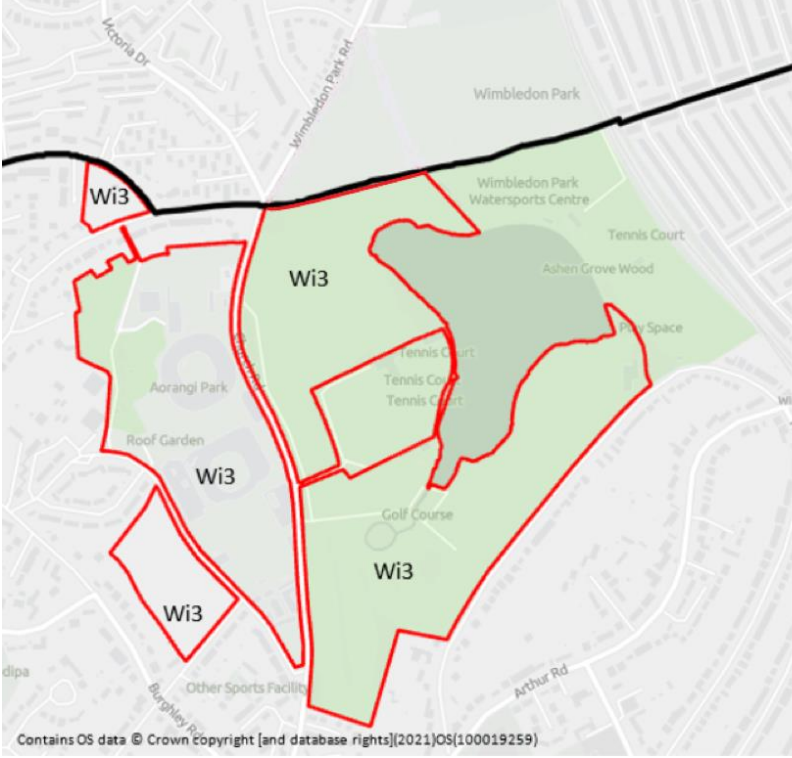
Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
		guidance: text			
MM3.1	204	Site Allocation Mo4, Approach to tall buildings	The Strategic Heights Diagram for the Morden Regeneration Zone sets out the height limits for this. However, all building heights will be <u>This site will include tall buildings in appropriate locations</u> subject to consideration of impacts on existing character, heritage and townscape <u>in accordance with policies D12.3 'Ensuring high quality design for all developments', D12.5 'Managing heritage assets' and D12.6 'Tall buildings' part of a plan-led approach, which could take the form of a masterplan, supplementary planning document or an outline planning application.</u>	See above – Initial MM3.1 at Page 81 Plan Ref. Policy N3	November 2021 – for submission
MM3.2b	227	Site Allocation RP1, Infrastructure Requirements	This site is in an area identified as being deficient in access to nature. The Council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies. This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies. This site is in an area identified as being deficient in access to children's play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.	To ensure the plan is justified and that the infrastructure requirements set out in the Site Allocation are clear.	September 2022 – response to Stage 2 MIQs.
MM3.1a	229	Site Allocation RP2, Design and accessibility guidance	The Exception Test is not needed, <u>h</u>However, <u>its proximity to areas of Flood Zone 3a and the risk of flooding from the Pyl Brook in the future because of climate change; development proposals must incorporate all recommendations in Merton's Strategic Flood Risk Assessment (SFRA). development proposals must have regard to both level 1 and level 2 of Merton's Strategic Flood Risk Assessment (SFRA). For this site allocation, development proposals must incorporate the site-specific recommendations on managing and mitigating flood risk from all sources, including the suitability of sustainable drainage systems (SuDS). These can be found in the SFRA level 2 in Appendix A.</u>	See above - initial MM3.1a at Page 89	September 2022 – in response to actions arising from Stage 1 Hearings
MM3.1a	232	Site Allocation RP3, Design and accessibility guidance	<u>Development proposals must have regard to both level 1 and level 2 of Merton's Strategic Flood Risk Assessment (SFRA). For this site allocation, development proposals must incorporate the site-specific recommendations on managing and mitigating flood risk from all sources, including the suitability of sustainable drainage systems (SuDS). These can be found in the SFRA level 2 in Appendix A.</u>	See above - initial MM3.1a at Page 89	September 2022 – in response to actions arising from Stage 1 Hearings

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			Development proposal must incorporate the recommendations of Merton's Strategic Flood Risk Assessment.		
MM1.1a	233	Site allocation RP3 Burlington Road, Approach to tall buildings	The size of the whole site RP.3 allows for a master planned approach which could contain taller buildings...	See above - initial MM1.1a at Page 14	September 2022 – in response to actions arising from Stage 1 Hearings
MM3.1	233	Site allocation RP3 Burlington Road, Approach to tall buildings	The size of the whole site RP.3 allows for a master planned approach which could contain taller (MM1.1a) buildings <u>up to 15 storeys subject to consideration of design policies.</u>	See above – Initial MM3.1 at Page 81 Plan Ref. Policy N3 and to add clarity to three site allocations outside town centres (Mi1; Mi16 and RP3)	March 2022 – response to Inspectors' preliminary matters
MM6.0	234	Site Allocation RP4 Bushey Road site allocation and deliverability	Site allocation: <u>Commercial (including retail subject to the relevant tests being met), business and industrial uses where such uses are appropriate to a residential area. Long term this site has potential for residential-led mixed use development which could include with potential for ground and lower floors commercial,</u> business, services and local community uses appropriate to a residential area. Site deliverability: <u>0-5 years for commercial, business and industrial uses; 10-15 years for mixed use residential.</u>	To ensure the plan is effective.	September 2022 - In response to the Inspectors questions
MM6.1	235	Site Allocation RP4, Design and accessibility guidance	Development proposals will need to incorporate suitable mitigation measures <u>to address the issues associated with the critical drainage area.</u>	To improve clarity and accuracy and ensure the plan is justified.	September 2022 - In response to the Inspectors questions
MM3.1a	235	Site Allocation RP4, Design	<u>Development proposals must have regard to both level 1 and level 2 of Merton's Strategic Flood Risk Assessment (SFRA). For this site allocation, development proposals must incorporate the site-specific recommendations on managing and</u>	See above - initial MM3.1a at Page 89	September 2022 – in response to

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
		and accessibility guidance	<u>mitigating flood risk from all sources, including the suitability of sustainable drainage systems (SuDS). These can be found in the SFRA level 2 in Appendix A.</u>		actions arising from Stage 1 Hearings
MM3.1a	238	Site Allocation RP5, Design and accessibility guidance	<u>Development proposals must have regard to both level 1 and level 2 of Merton's Strategic Flood Risk Assessment (SFRA). For this site allocation, development proposals must incorporate the site-specific recommendations on managing and mitigating flood risk from all sources, including the suitability of sustainable drainage systems (SuDS). These can be found in the SFRA level 2 in Appendix A.</u>	See above - initial MM3.1a at Page 89	September 2022 – in response to actions arising from Stage 1 Hearings
MM3.1a	241	Site Allocation RP6, Design and accessibility guidance	<u>Development proposals must have regard to both level 1 and level 2 of Merton's Strategic Flood Risk Assessment (SFRA). For this site allocation, development proposals must incorporate the site-specific recommendations on managing and mitigating flood risk from all sources, including the suitability of sustainable drainage systems (SuDS). These can be found in the SFRA level 2 in Appendix A.</u> Development proposals must incorporate the recommendations of Merton's Strategic Flood Risk Assessment.	See above - initial MM3.1a at Page 89	September 2022 – in response to actions arising from Stage 1 Hearings
MM3.1a	247	Site Allocation RP8, Design and accessibility guidance	Development proposal must incorporate the recommendation of Merton's Strategic Flood Risk Assessment. <u>Development proposals must have regard to both level 1 and level 2 of Merton's Strategic Flood Risk Assessment (SFRA). For this site allocation, development proposals must incorporate the site-specific recommendations on managing and mitigating flood risk from all sources, including the suitability of sustainable drainage systems (SuDS). These can be found in the SFRA level 2 in Appendix A.</u> The railway embankment acts as a barrier to surface water flow through the centre of the critical drainage area. Historic surface water flooding records identify drainage network capacity issues which cause water flooding in this area during heavy rainfall.	See above - initial MM3.1a at Page 89	September 2022 – in response to actions arising from Stage 1 Hearings
MM2.2	255	Policy N7.1 part d	Support developments in the Local Centre that create a well-designed shopfront in accordance with Merton's shopfront guidance and encouraging landowners and businesses fronting Merton High Street, Kingston Road, Morden Road and Merton Road to improve their shopfronts and building facades;	See above - initial MM2.2 at page 42.	March 2022 – response to Inspectors' preliminary matters
MM3.1	267	Wimbledon: Policy N9.1, new part between (d) and (e.)	<u>Supporting tall buildings within Wimbledon town centre in accordance with the details in the Strategic Heights Diagram for Wimbledon town centre, the requirements in Policy D12.6 Tall Buildings</u>	See above – Initial MM3.1 at Page 81 Plan Ref. Policy N3 In March 2022 reference to the	November 2021 – for submission March 2022 – response to

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				Future Wimbledon SPD was removed from this modification to address the Inspectors' Preliminary Questions letter paragraphs 37-40	Inspectors' preliminary matters
MM2.2	268	Policy N9.1, part h	h. Promoting good placemaking by providing places for people to meet, relax, enjoy events and participate in the town centre. as set out in the public space framework in the Future Wimbledon SPD.	See above - initial MM2.2 at page 42.	March 2022 – response to Inspectors' preliminary matters
MM9.1	268	Wimbledon: Policy N9.1, part j.	Securing <u>improvements to public transport and (AM9.2)</u> investment in Wimbledon station to improve the passenger experience and reduce severance with new bridges over the railway . Any proposals for Wimbledon Station should provide links to neighbouring sites and enable the creation of new public realm, including an enhanced station forecourt/town square.	Main modification to make the plan effective and deliverable by removing reference to new bridges over the railway as this would need to be enabled by Crossrail2, which is unlikely to occur in the plan period.	November 2021 – for submission
MM9.2	268	Wimbledon Policy N9.1, new part after j	<u>Creating a more pleasant environment for shopping and leisure activities in by reducing traffic dominance and managing delivery and servicing needs in a safe, efficient and sustainable way, including through exploring the use of freight consolidation and last mile delivery solutions.</u>	For consistency with national policy and clarity.	November 2021 – for submission
MM9.2a	277	Site Allocation Wi1	Indicative site capacity (new homes): 50– 70-1035 new homes	Effectiveness	May 2022- response to the inspectors' questions

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM9.3	281	Site Allocation Wi2	<p>Approach to taller buildings.</p> <p>Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in the Future Wimbledon SPD. The Strategic Heights Diagram for Wimbledon Town Centre, in D12.6 'Tall buildings', sets out the height limits for this.</p> <p><u>However, all building heights will be subject to consideration of impacts on existing character, heritage and townscape in accordance with policies D12.3 'Ensuring high quality design for all developments', D12.5 'Managing heritage assets' and D12.6 'Tall buildings' and have regard to the Future Wimbledon SPD.</u></p>	For further clarity on building heights and general conformity with the London Plan Policy.	<p>March 2022 – response to Inspectors' preliminary matters</p> <p>May 2022</p>
MM3.2a	281	Site Allocation Wi2, Infrastructure Requirements	The developer should contact SGN (Southern Gas Networks) and Thames Water to discuss requirements for any improvements to the water, wastewater and gas infrastructure network from non-residential development.	See above - initial MM3.2a at Page 96	September 2022 – in response to Stage 2 MIQs
MM3.2b	281	Site Allocation Wi2, Infrastructure Requirements	<p>This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies.</p> <p>This site is in an area identified as being deficient in access to children's play space for ages 0-4 years. The Council will require on-site provision in accordance with the infrastructure policies and London Plan.</p>	To ensure the plan is justified and that the infrastructure requirements set out in the Site Allocation are clear.	September 2022 – response to Stage 2 MIQs.
MM9.3a	282	Site Allocation Wi3	<i>(Replace site allocation map with the following:)</i>	To clearly show the Metropolitan Open Land on, and adjacent to, the site, to improve clarity and effectiveness.	September 2022 - in response to action arising from Stage 1 Hearings of Merton's Local Plan.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
					
MM9.4	283 and 284	Site allocation Wi3	<p><i>Move the following existing paragraph from “site description” on page 283 to “design and accessibility guidance” on page 284:</i></p> <p><u>The golf course is part of a Capability Brown designed Grade II* Registered Park and Garden (along with Wimbledon Park and the Wimbledon Club) and is designated as Metropolitan Open Land, a Site of Importance for Nature Conservation, designated Open Space and within a Conservation Area. Any tennis related development on the golf course will need to respond to these sensitive designations.</u></p>	To make the plan effective and in recognition of the Statement of Common Ground between LB Merton and LB Wandsworth, January 2022	May 2022 – response to the Inspectors’ questions
MM9.4a	283	Site Allocation Wi3	<p>The AELTC have commenced the preparation of an updated masterplan <u>new masterplan to investigate and identify the future development opportunities for the AELTC estate and The Championships incorporating the golf course. In August 2021 the AELTC submitted planning application 21/P2900 to Merton Council.</u></p>	To improve clarity	September 2022 - in response to action arising

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
					from Stage 1 Hearings of Merton's Local Plan.
MM9.4b	283	Site Allocation Wi3	Secure investment in the former golf course to invest in and <u>conserve and enhance</u> reimagine the historic landscape	To make the plan effective and in recognition of the Statement of Common Ground between LB Merton and Historic England June 2022	September 2022 - in response to action arising from Stage 1 Hearings of Merton's Local Plan.
MM9.4c	283	Site Allocation Wi3, design and accessibility guidance	<p><u>The golf course is part of a Capability Brown designed Grade II* Registered Park and Garden (along with Wimbledon Park and the Wimbledon Club).</u></p> <p><u>The Wimbledon Park Registered Park and Garden was added to Historic England's Heritage At Risk Register due to the following issues:</u></p> <ul style="list-style-type: none"> • <u>Uncertainty around the future [of the entire historic landscape];</u> • <u>The impacts of divided ownership on landscape management;</u> • <u>Obscured views; and</u> • <u>The deterioration of the Lake</u> <p><u>It is designated as Metropolitan Open Land, a Site of Importance for Nature Conservation, designated Open Space and within a Conservation Area. Any tennis related development on the golf course will need to respond to these sensitive designations.</u></p> <p><u>Development proposals must secure the production of a landscape management and maintenance plan as part of any development proposals that may come forward, to provide a comprehensive plan for the conservation, enhancement and ongoing management of the entire registered park and garden that takes full account of the site's historic development and significance, acting as a common agreed baseline for all parties to work from.</u></p>	To make the plan effective, in conformity with national policy and in recognition of the Statement of Common Ground between LB Merton and Historic England June 2022	September 2022 - in response to action arising from Stage 1 Hearings of Merton's Local Plan.
MM9.4d	283	Site Allocation Wi3, design	Development proposal must respect the site's historic setting including the views to St Mary's Church and the surrounding area and the views from the Grade II* listed Wimbledon Park <u>and those identified in the Wimbledon north conservation</u>	To make the plan effective, in conformity with	September 2022 - in response to

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
		and accessibility guidance	<u>area appraisal.</u>	national policy and in recognition of the Statement of Common Ground between LB Merton and Historic England June 2022	action arising from Stage 1 Hearings of Merton's Local Plan
MM9.4e	284	Site Allocation Wi3, design and accessibility guidance	<p><u>Wimbledon Park lake is the clearest surviving feature from the Capability Brown landscape and its poor quality is one of the reasons that Wimbledon Park is on the "heritage at risk" register. Development proposals will need to:</u></p> <ul style="list-style-type: none"> <u>improve public access around the whole lake, alongside ecological, sporting and reservoir management considerations.</u> <u>address the poor condition of the lake.</u> <u>seek restoration of the historic shape of the lake</u> <p><u>Development proposals must:</u></p> <ul style="list-style-type: none"> <u>identify and protect historic trees and other trees of significant amenity value and consider a programme for their renewal and replanting as appropriate.</u> <u>Consider the removal of insensitive tree and other planting on the former golf course.</u> 	To make the plan effective and in conformity with national policy	September 2022 – in response to evidence compiled on Site Wi3
MM9.5	284	Site allocation Wi3, design and accessibility guidance	<p><i>Design and Accessibility guidance:</i> Development proposal must respect the site's historic setting including the views to St Mary's Church and the surrounding area and the views from the Grade II* listed Wimbledon Park.</p> <p>...</p> <p><i>Impacts listed buildings or undesignated heritage assets</i> Yes, the AELTC golf course, together with Wimbledon Park (owned by Merton Council) and the Wimbledon Club (privately owned) are the remains of a 18th century Capability Brown designed landscape which is now a Grade II* listed Historic Park and is on the "heritage at risk register"</p>	Consistency with national policy and with Grade II* reference already included in Wi3 site description on page 283	May 2022 – response to the Inspectors' questions
MM9.5a	284	Site allocation Wi3, new	<u>In accordance with NPPF 142, proposals for this site must also include improvements to the environmental quality and accessibility of the Wimbledon Park MOL. The Merton Green Infrastructure Study can be used to identify</u>	For clarity and consistency with national policy.	May 2022 – response to the

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
		paragraph under Infrastructure requirements	<u>appropriate landscape, visual and biodiversity enhancements, new green infrastructure and improvements to access to existing recreational and sporting facilities for this site.</u>		Inspectors' MIQ.
MM3.2a	284	Site allocation Wi3, Infrastructure requirements	The developer should contact Thames Water and SGN (Southern Gas Networks) to discuss requirements for any improvements to the water, wastewater and gas infrastructure network.	See above - initial MM3.2a at Page 96	September 2022 – in response to Stage 2 MIQs.
MM9.5b	284	Site Allocation Wi3 infrastructure requirements	<u>Wimbledon Park Lake is a registered reservoir and must be managed in accordance with the Reservoir Act 1975.</u> <u>To assess any potential environmental impacts to Wimbledon Common (Special Area of Conservation), development proposal must be supported by measures set out in planning policies for on-site and off-site environmental monitoring. Development proposals will be required to submit a full Construction Logistics Plan - outlining all phases of construction'. Development proposals must support the installation of air quality monitoring devices along the A219 (Parkside) during the construction of the site.</u>	To ensure the plan is consistent with national policy, justified and effective	September 2022 – in response to evidence compiled on Site Wi3 including the Habitats Regulations Assessment – Stage 1 hearings
MM9.5c	285	Site allocation Wi3, Impacts a designated open space	Yes, <u>Metropolitan Open Land (MOL)</u> and designated open space. <u>A small area of MOL will be removed from this site, due to exceptional circumstances in accordance with NPPF 140. Refer to the Appendices, Strategic Policy O15.1 and the Policies Map for further information on MOL.</u>	To ensure the plan is consistent with national policy.	September 2022 - in response to Stage 2 MIQs and action from Stage 1 hearings.
MM9.3	288	Site Allocation Wi5, Approach to tall buildings.	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in the Future Wimbledon SPD. <u>The Strategic Heights Diagram for Wimbledon Town Centre, in D12.6 'Tall buildings', sets out the height limits for this.</u>	See above - initial MM9.3 at page 281	March 2022 – response to Inspectors' preliminary matters

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			<u>However, all building heights will be subject to consideration of impacts on existing character, heritage and townscape in accordance with policies D12.3 'Ensuring high quality design for all developments', D12.5 'Managing heritage assets' and D12.6 'Tall buildings' and have regard to the Future Wimbledon SPD.</u>		May 2022
MM9.3	290	Site Allocation Wi6, Approach to tall buildings.	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in the Future Wimbledon SPD. <u>The Strategic Heights Diagram for Wimbledon Town Centre, in D12.6 'Tall buildings', sets out the height limits for this.</u> <u>However, all building heights will be subject to consideration of impacts on existing character, heritage and townscape in accordance with policies D12.3 'Ensuring high quality design for all developments', D12.5 'Managing heritage assets' and D12.6 'Tall buildings' and have regard to the Future Wimbledon SPD.</u>	See above - initial MM9.3 at page 281.	March 2022 – response to Inspectors' preliminary matters May 2022
MM3.2b	290	Site Allocation Wi6, Infrastructure Requirements	This site is in an area identified as being deficient in access to public open space. The Council will require proposals to improve access to publicly accessible open space, either through design and public realm improvements, or by providing new publicly accessible open space on site, in accordance with the Green Infrastructure policies. This site is in an area identified as being deficient in access to children's play space for ages 0-4 years. The Council will require on-site provision in accordance with the infrastructure policies and London Plan.	To ensure the plan is justified and that the infrastructure requirements set out in the Site Allocation are clear.	September 2022 – response to Stage 2 MIQs.
MM3.1a	293	Site Allocation Wi7, Design and accessibility guidance	Development proposals will need to incorporate suitable mitigation measures to address the issues associated with the functional floodplain to minimise flood risk for future occupiers and the potential for water pollution from this site. This includes incorporating the recommendations for this site in Merton's Strategic Flood Risk Assessment Level 2. <u>Development proposals must have regard to both level 1 and level 2 of Merton's Strategic Flood Risk Assessment (SFRA). For this site allocation, development proposals must incorporate the site-specific recommendations on managing and mitigating flood risk from all sources, including the suitability of sustainable drainage systems (SuDS). These can be found in the SFRA level 2 in Appendix A.</u>	See above - initial MM3.1a at Page 89	September 2022 – in response to actions arising from Stage 1 Hearings
MM3.1a	296	Site Allocation Wi8, Design	Development proposal must incorporate recommendation within Merton's Strategic Flood Risk Assessment to address the issues associated with the location within a flood zone.	See above - initial MM3.1a at Page 89	September 2022 – in response to

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
		and accessibility guidance	<u>Development proposals must have regard to both level 1 and level 2 of Merton's Strategic Flood Risk Assessment (SFRA). For this site allocation, development proposals must incorporate the site-specific recommendations on managing and mitigating flood risk from all sources, including the suitability of sustainable drainage systems (SuDS). These can be found in the SFRA level 2 in Appendix A.</u>		actions arising from Stage 1 Hearings
MM9.3	299	Site Allocation Wi9, Approach to tall buildings.	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in the Future Wimbledon SPD. <u>The Strategic Heights Diagram for Wimbledon Town Centre, in D12.6 'Tall buildings', sets out the height limits for this.</u> <u>However, all building heights will be subject to consideration of impacts on existing character, heritage and townscape in accordance with policies D12.3 'Ensuring high quality design for all developments', D12.5 'Managing heritage assets' and D12.6 'Tall buildings' and have regard to the Future Wimbledon SPD.</u>	See above - initial MM9.3 at page 281.	March 2022 – response to Inspectors' preliminary matters May 2022
MM9.3	302	Site Allocation Wi10, Approach to tall buildings.	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in the Future Wimbledon SPD. <u>The Strategic Heights Diagram for Wimbledon Town Centre, in D12.6 'Tall buildings', sets out the height limits for this.</u> <u>However, all building heights will be subject to consideration of impacts on existing character, heritage and townscape in accordance with policies D12.3 'Ensuring high quality design for all developments', D12.5 'Managing heritage assets' and D12.6 'Tall buildings' and have regard to the Future Wimbledon SPD.</u>	See above - initial MM9.3 at page 281.	March 2022 – response to Inspectors' preliminary matters May 2022
MM3.2b	3.2	Site Allocation Wi10, Infrastructure Requirements	This site is in an area identified as being deficient in access to nature. The Council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies. This site is in an area identified as being deficient in access to children's play space for ages 0-4 years and 5-11 years. The Council will require on-site provision in accordance with the infrastructure policies and London Plan.	To ensure the plan is justified and that the infrastructure requirements set out in the Site Allocation are clear.	September 2022 – response to Stage 2 MIQs.
MM9.3	305	Site Allocation Wi11, Approach to	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in the Future Wimbledon SPD. <u>The Strategic Heights Diagram for Wimbledon Town Centre, in D12.6 'Tall</u>	See above - initial MM9.3 at page 281.	March 2022 – response to Inspectors'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
		tall buildings.	<u>buildings', sets out the height limits for this.</u> <u>However, all building heights will be subject to consideration of impacts on existing character, heritage and townscape in accordance with policies D12.3 'Ensuring high quality design for all developments', D12.5 'Managing heritage assets' and D12.6 'Tall buildings' and have regard to the Future Wimbledon SPD.</u>		preliminary matters May 2022
MM3.2b	305	Site Allocation Wi11, Infrastructure Requirements	This site is in an area identified as being deficient in access to children's play space for ages 0-4 years and 5-11 years. The council will require on-site provision in accordance with the infrastructure policies and London Plan.	To ensure the plan is justified and that the infrastructure requirements set out in the Site Allocation are clear.	September 2022 – response to Stage 2 MIQs.
MM3.1a	307	Site Allocation Wi12, Design and accessibility guidance	The design and layout must incorporate the recommendation of Merton's Strategic Flood Risk Assessment. Development proposals must have regard to both level 1 and level 2 of Merton's Strategic Flood Risk Assessment (SFRA). For this site allocation, development proposals must incorporate the site-specific recommendations on managing and mitigating flood risk from all sources, including the suitability of sustainable drainage systems (SuDS). These can be found in the SFRA level 2 in Appendix A.	See above - initial MM3.1a at Page 89	September 2022 – in response to actions arising from Stage 1 Hearings
MM9.6	308	Site Allocation Wi12, Approach to tall buildings	Development of the site could include taller buildings of up to 10 storeys subject to consideration of impacts on existing character and townscape. subject to consideration of impacts on existing character and townscape in accordance with policies D12.3 'Ensuring high quality design for all developments' and D12.6 'Tall buildings'.	For further clarity on building heights and general conformity with the London Plan Policy.	May 2022
MM9.3	311	Site Allocation Wi13, Approach to tall buildings	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in the Future Wimbledon SPD. The Strategic Heights Diagram for Wimbledon Town Centre, in D12.6 'Tall buildings', sets out the height limits for this. <u>However, all building heights will be subject to consideration of impacts on existing character, heritage and townscape in accordance with policies D12.3 'Ensuring high quality design for all developments', D12.5 'Managing heritage assets' and D12.6 'Tall buildings' and have regard to the Future Wimbledon</u>	See above - initial MM9.3 at page 281.	March 2022 – response to Inspectors' preliminary matters May 2022

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM3.2b	311	Site Allocation Wi13, Infrastructure Requirements	<u>SPD.</u> This site is in an area identified as being deficient in access to nature. The Council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies. This site is in an area identified as being deficient in access to children's play space for ages 0-4 years and 5-11 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.	To ensure the plan is justified and that the infrastructure requirements set out in the Site Allocation are clear.	September 2022 – response to Stage 2 MIQs.
MM9.3	314	Site Allocation Wi15 Approach to tall buildings	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in the Future Wimbledon SPD. The Strategic Heights Diagram for Wimbledon Town Centre, in D12.6 'Tall buildings', sets out the height limits for this. <u>However, all building heights will be subject to consideration of impacts on existing character, heritage and townscape in accordance with policies D12.3 'Ensuring high quality design for all developments', D12.5 'Managing heritage assets' and D12.6 'Tall buildings' and have regard to the Future Wimbledon SPD.</u>	See above - initial MM9.3 at page 281.	March 2022 – response to Inspectors' preliminary matters May 2022
MM9.1	317	Site allocation Wi16	Development proposals must provide links and access to Wimbledon Station and nearby bus stops, which surround the site. They must also look to facilitate a potential road bridge linking Queen's Road and Alexandra Road to the rear of the site.	See above – Initial MM9.1 at Page 268 Plan Ref. Policy N9.1, part j.	November 2021 – for submission
MM3.2b	317	Site Allocation Wi16, Infrastructure Requirements	This site is in an area identified as being deficient in access to nature. The council will require proposals to alleviate this deficiency in accordance with the Green Infrastructure policies. This site is in an area identified as being deficient in access to children's play space for ages 0-4 years. The Council will require on site provision in accordance with the infrastructure policies and London Plan.	To ensure the plan is justified and that the infrastructure requirements set out in the Site Allocation are clear.	September 2022 – response to Stage 2 MIQs.
MM9.3	318	Site Allocation Wi16,	Development of the site could include taller buildings subject to consideration of impacts on the setting of the adjacent listed building, existing character and townscape and in line with the height parameters set out in the Future Wimbledon SPD. The Strategic Heights Diagram for Wimbledon Town Centre, in D12.6 'Tall	See above - initial MM9.3 at page 281.	March 2022 – response to Inspectors'

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
		Approach to tall buildings	<u>buildings', sets out the height limits for this.</u> <u>However, all building heights will be subject to consideration of impacts on existing character, heritage and townscape in accordance with policies D12.3 'Ensuring high quality design for all developments', D12.5 'Managing heritage assets' and D12.6 'Tall buildings' and have regard to the Future Wimbledon SPD.</u>		preliminary matters May 2022
MM10.1	328	New paragraph after 10.1.31	<u>Developers will be expected to demonstrate how they have incorporated dementia-friendly approaches in submitted planning applications and, where relevant, at Design Review Panel.</u>	Modification to ensure that the Plan is justified and effective and clearly sets out how comments from dementia friendly design organisations will be part of the design review process.	September 2022
MM10.2	329	Policy HW10.2(a)(i)	a. We will require development proposals to: <ul style="list-style-type: none"> i Contribute towards the health priorities of Merton Health and Wellbeing Strategy Board and partners to help reduce inequalities, including health, across Merton. 	Modification to ensure that the Plan is clear, justified and effective.	September 2022
MM10.3	329		b. We will: <ul style="list-style-type: none"> i Use the Healthy Streets Approach to priorities health and wellbeing in planning decisions. ii Require all developments in Merton of 100+ residential units or over 10,000m2 non-residential development to carry out a Health Impact Assessment (HIA). iii Require a HIA for developments of over 50 homes or more in areas identified by government's the Ministry of Housing, Communities and Local Government (MHCLG) Indices of Deprivation or identified in Merton's Joint Strategic Needs Assessment (JSNA) as an area of health priorities. iv Require a HIA for the following developments: <ul style="list-style-type: none"> • Cumulative impact – the proposed <u>major</u> development is 	Modification to ensure that the Plan is clear, justified and effective.	September 2022

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			in an area with two or more other major developments planned or started.		
MM10.4	330	New paragraph after para 10.2.1	<p><u>Merton's Health and Wellbeing Strategy</u> <u>Merton's Health and Wellbeing Strategy (2019-2024) has four main themes for Merton residents to Start Well, Live Well and Age Well in a Healthy Place. The strategy has a number of priorities for example:</u></p> <ul style="list-style-type: none"> • <u>Tackling health inequalities: especially the east/west health divide in the borough</u> • <u>Health in All Policies approach: maximising the positive health impacts across all policies and challenging negative impacts.</u> <p><u>All development proposals are required to positively contribute to the council's health priorities as set out in the Health and Wellbeing Strategy.</u></p>	Modification to ensure that the Plan is clear, justified and effective.	September 2022.
MM10.5	331	New paragraphs after 10.2.7	<p><u>Indices of Multiple Deprivation</u></p> <p><u>The Indices of Deprivation provide a set of relative measures of deprivation at a small local area level (Lower-layer Super Output Areas) across England, based on seven different domains, or facets, of deprivation:</u></p> <ul style="list-style-type: none"> • <u>Income</u> • <u>Employment</u> • <u>Education, Skills and Training</u> • <u>Health and Disability</u> • <u>Crime</u> • <u>Barriers to Housing and Services</u> • <u>Living Environment</u> <p><u>Combining information from the seven domains produces an overall relative measure of deprivation, the Index of Multiple Deprivation (IMD). The Index of Multiple Deprivation (IMD) ranks every small area in England from 1 (most deprived area) to 32,844 (least deprived area).</u></p> <p><u>Merton ranks as the 214th least deprived local authority district in terms of average IMD (2019) (out of a total of 317), and the 5th least deprived borough in London (out of a total of 32 boroughs). However, there are pocket of deprivation across Merton with more in the east of the borough. Developers are expected to refer to the government's IMD reports mapping sources and demonstrate how the</u></p>	Modification to ensure that the Plan is clear, justified and effective.	September 2022

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			<p><u>information has informed proposals by way of the HIA. To comply with policy HW10.2 (b)(iii) above, developments of 50 homes or more located in a IMD decile that is 5 or less must submit a Health Impact Assessment.</u></p> <p>Cumulative impact <u>Proposed development within 800 metres of two or more other major developments planned or started will be required to carry out a HIA. The HIA must have regard to other development proposals planned or started and demonstrate that the cumulative impact is positive and will contribute to a healthy environment.</u></p>		
MM11.1	333	H11.1	<u>Strategic</u> policy H11.1 Housing Choice	To comply with NPPF para 20(a) - in response to Inspectors' Preliminary Matters question (d) March 2022	March 2022 – response to Inspectors' preliminary matters
MM1.1	333	H11.1	(e.) Aim for the strategic target of 50% of new homes built in Merton between 2021/ <u>22</u> -2036/ <u>37</u> to be affordable.	See above - initial MM1.1 at Page 14	March 2022 – response to Inspectors' preliminary matters September 2022 – response to Stage 2 MIQs
MM11.1a	334	Policy H11.1 Housing choice, part f. Table	Affordable housing level Threshold level to be eligible for the Fast-Track Route as set out in the London Plan provided all provision <u>accords with the tenure mix requirements of Strategic Policy H11.1 and</u> is on-site without public subsidy:	To address GLA response and improve clarity. AM11.2. <i>Moved to Main Modifications in response to</i>	November 2021 – for submission May 2022

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				<i>Inspectors preliminary letter, March 2022</i>	
MM11.2	334	Policy H11.1 Housing choice, part f. Table	<p>Affordable housing tenure split</p> <p>10 or more homes 70% Low-cost rent</p> <p>30% Intermediate <u>(Including a minimum of 25% First Homes)</u></p> <p>2-9 homes 70% Low-cost rent</p> <p>30% Intermediate <u>(Including a minimum 25% First Homes)</u></p>	To comply more effectively with the PPG on First Homes and to improve clarity of the Plan	May 2022- response to Inspectors’ Matters, Issues and Questions
MM11.3	334	Policy H11.1 Housing choice, part f. Table	Only in exceptional circumstances will the provision of affordable housing off-site or financial contribution in lieu of provision on-site be considered by the council, and this must be justified, and such schemes will be required to provide a detailed viability assessment <u>and contribute to the objective of creating mixed and balanced communities.</u>	To be consistent with NPPF and in general conformity with the London Plan	May 2022- response to Inspectors’ Matters, Issues and Questions
MM2.2	334	Policy H11.1, part i	For schemes of 10 homes and above, affordable housing is required to be provided on-site. In exceptional circumstances, where the applicant has robustly demonstrated to the council that on-site provision is not feasible, we may consider a financial contribution equivalent. This justification must include the provision of a detailed financial appraisal. For these schemes, off-site and cash in lieu schemes must accord with the requirements set out in The London Plan and <u>have regard to the Mayor’s Affordable Housing and Viability SPG (Supplementary Planning Guidance) (2017) or subsequent updates to these</u>	See above - initial MM2.2 at page 42.	March 2022 – response to Inspectors’ preliminary matters
MM11.4	339	New paragraph following Figure 4.1.3 and before paragraph 11.1.12	<u>For First Homes the affordable home ownership prices will differ from those set out in supporting paragraph 11.1.11 and Figure 4.1.3 as in accordance with government requirements First Homes must be discounted by a minimum of 30% against the market value and after the discount is applied the first sale must be at a price no higher than £420,000 in Greater London.</u>	To comply more effectively with the PPG on First Homes and to improve clarity of the Plan	May 2022- response to Inspectors’ Matters, Issues and Questions

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM11.5	339	Paragraph 11.1.14	First Homes are a form of discounted market sales housing and to be considered as such must meet the requirements set out in the MHCLG Ministerial Statement published on 24th May 2021 Written statements - Written questions, answers and statements - UK Parliament and the definition and eligibility requirements set out in NPPG Guidance https://www.gov.uk/guidance/first-homes . <u>These national policies and guidance, in addition to paragraph 64 of the National Planning Policy Framework also set out specific exceptions to the general requirements for First Homes and low-cost home ownership dwellings which we will have regard to as appropriate in the determination of submitted planning applications.</u>	To improve clarity of the Plan	May 2022- response to Inspectors' Matters, Issues and Questions
MM11.6	339	Paragraph 11.1.14	First Homes are an intermediate tenure therefore in accordance with government requirements, proposals for new homes will be considered against the intermediate tenure split element of Policy H11.1(Housing Choice). <u>On schemes where policy-compliant provision of First Homes does not result in 10% of the overall housing yield of the site being available for affordable home ownership, any shortfall in this respect would need to be made up from the rest of the intermediate contribution before other types of intermediate affordable housing would be considered.</u>	To comply more effectively with the PPG on First Homes and to improve clarity	May 2022- response to Inspectors' Matters, Issues and Questions
MM11.7	341	Paragraph 11.1.19	Only in exceptional circumstances for schemes proposing 10 or more homes (gross) will the provision of affordable housing off-site or as a financial contribution in lieu of provision on site be considered subject to demonstrating to our satisfaction that this exception is justified, <u>and such schemes will be required to contribute to the objective of creating mixed and balanced communities and meet the requirements set out in the London Plan supporting paragraphs 4.4.9 to 4.4.13 (inclusive).</u>	To be consistent with NPPF and in general conformity with the London Plan	May 2022- response to Inspectors' Matters, Issues and Questions
MM11.7a	341	Paragraph 11.1.22	Affordable housing monetary contributions in lieu of on-site provision will be calculated on a case-by-case basis according to the following formula: A-B=C Where: A= <u>residual</u> value of the proposed development assuming 100% of the residential homes are provided as private housing <u>established through a development appraisal</u> B= the <u>residual</u> value that would otherwise have been achieved by the proposed development incorporating affordable housing in accordance with the affordable	To improve clarity <i>(Formerly Additional Modification AM11.2c)</i>	September 2022 – in response to actions arising from Stage 1 Hearings

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			housing policy requirement <u>established through a development appraisal.</u> C= payment in lieu		
MM11.8	342	Paragraph 11.1.23	<u>In accordance with the NPPF and London Plan Policy H7 (Monitoring of affordable housing) The the</u> information on off-site and cash in lieu delivery is monitored and published <u>annually</u> as part of Merton's <u>annual</u> Infrastructure Funding Statement <u>and Merton's Authority Monitoring Report (AMR).</u>	To be consistent with NPPF and in general conformity with the London Plan	May 2022- response to Inspectors' Matters, Issues and Questions
MM11.9	345	New paragraph below 11.1.38	<u>Securing M4(2) and M4(3) dwellings</u> <u>There may be site specific factors and viability issues which may warrant flexibility in the application of the accessible housing standards M4(2) and M4(3) requirements set out in Policy 11.1(d) for specific developments. The council will have regard to the exceptional circumstances detailed in PPG (Housing for Older and Disabled People); Government Housing: optional technical standards and paragraph 3.7.6 of the London Plan or subsequent updates to these in determining where the application of flexibility is warranted.</u>	To comply with PPG (Housing for Older and Disabled People) and Housing Optional Technical Standards	May 2022- response to Inspectors' Matters, Issues and Questions
MM11.10	345	New paragraph below 11.1.38	<u>M4(2) and M4(3) dwellings should be secured via planning conditions to allow the Building Control body to check compliance of a development against the optional Building Regulations standards.</u>	To comply with PPG (Housing for Older and Disabled People) and Housing Optional Technical Standards	May 2022- response to Inspectors' Matters, Issues and Questions
MM11.1	346	Policy H11.2	<u>Strategic</u> policy H11.2 Housing Provision	To comply with NPPF para 20(a) - in response to Inspectors' Preliminary Matters question (d) March 2022	May 2022- response to Inspectors' Matters, Issues and Questions
MM1.1	346	Policy H11.2	We will aim to deliver a minimum of 11,732 12,376 additional homes for the period 2021/22 - 2035/36 2036/37 .	See above - initial MM1.1 at Page 14	September 2022 – in

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
					response to Stage 2 MIQs
MM2.2	346	Policy H11.2, part c	Supporting the delivery of well-designed new homes on large and small sites (a site area below 0.25 hectares in size), which optimise levels of residential density in accordance with the design-led approach set out in the London Plan Policy D6 <u>and having regard to</u> Merton's design code guidance; having regard to site context; connectivity and accessibility by walking and cycling and existing and planned public transport (including PTAL (Public Transport Accessibility Level)); and the capacity and provision of supporting infrastructure.	See above - initial MM2.2 at page 42.	March 2022 – response to Inspectors' preliminary matters
MM11.10a	346	Policy H11.2(e)	Supporting the redevelopment of poor quality existing housing <u>and proposals to improve the quality of existing homes(MM2.2)</u> that does not result in a net loss of residential homes, or net loss of affordable housing homes or residential land or net loss resulting from the change of use of any type of <u>permanent</u> housing to <u>non-permanent accommodation, such as</u> temporary sleeping accommodation, on <u>a permanent basis for a cumulative period of more than 90 days a year.</u>	To improve clarity and effectiveness of the Plan.	September 2022 – in response to Stage 2 MIQs
MM1.1	347	11.2.1	The 11,732 <u>12,376</u> additional homes for the period 2021/22— 2035/36 - <u>2036/37</u> will come forward in Merton by:	See above - initial MM1.1 at Page 14	September 2022 – in response to Stage 2 MIQs
MM1.1	347	new paragraph below 11.2.4	<u>The SHLAA 2017 findings indicates that for Merton the target for the period 2029/30 to 2033/34 is 474 homes per annum then for the remaining period 2034/35 to 2036/37 increases to 548 homes per annum.</u>	See above - initial MM1.1 at Page 14 Formerly part of AM11.4. <i>Moved to Main Modifications in response to Inspectors preliminary letter, March 2022</i>	March 2022 – response to Inspectors' preliminary matters
MM1.1	348	11.2.5	In accordance with the London Plan requirements and in consultation with and endorsed by the GLA, the housing trajectory set out in Figure 4.2.1 demonstrates how Merton's housing target will be met for the Local Plan period <u>2021/22—2036/37</u> using a stepped housing delivery target.	See above - initial MM1.1 at Page 14	September 2022 – in response to Stage 2 MIQs

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made																																	
MM1.1	348	11.2.7 and Figure 4.2.2	<p>As Figure 4.2.2 below indicates Merton’s annual housing target will be set at 775 700 homes per annum for the period 2022/23 2024/22, <u>increasing to 950 for the period 2024/25 – 2026/27 2023/24</u>, and then increase to 1,080 1,555 for <u>2027/28 – 2028/29</u>the period 2024/25 – 2026/27, then further increase to <u>1,350 for the period 2027/28 – 2028/29</u>. This ensures that Merton’s Local Plan housing requirement for the Plan period 2022/23 – 2036/37 including the shortfall of 928 new homes is met.</p> <table border="1"> <thead> <tr> <th></th> <th>2021/22</th> <th>2022/23</th> <th>2023/24</th> <th>2024/25</th> <th>2025/26</th> <th>2026/27</th> <th>2027/28</th> <th>2028/29</th> <th>Shortfall from 2019/20 and 2020/21</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Merton Local Plan target</td> <td>775 918</td> <td>775 712</td> <td>775 712</td> <td>1,080 962</td> <td>1,080 962</td> <td>1,080 962</td> <td>1,350 1,567</td> <td>1,350 1,567</td> <td></td> <td>8265 8,362</td> </tr> <tr> <td>London Plan target</td> <td>1,033 918</td> <td>1,033 918</td> <td>1,033 918</td> <td>1,033 918</td> <td>1,033 918</td> <td>1,033 918</td> <td>1,033 918</td> <td>1,033 918</td> <td>928</td> <td>8265 7,344</td> </tr> </tbody> </table>		2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	Shortfall from 2019/20 and 2020/21	Total	Merton Local Plan target	775 918	775 712	775 712	1,080 962	1,080 962	1,080 962	1,350 1,567	1,350 1,567		8265 8,362	London Plan target	1,033 918	1,033 918	1,033 918	1,033 918	1,033 918	1,033 918	1,033 918	1,033 918	928	8265 7,344	See above - initial MM1.1 at Page 14	September 2022 – in response to Stage 2 MIQs
	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	Shortfall from 2019/20 and 2020/21	Total																												
Merton Local Plan target	775 918	775 712	775 712	1,080 962	1,080 962	1,080 962	1,350 1,567	1,350 1,567		8265 8,362																												
London Plan target	1,033 918	1,033 918	1,033 918	1,033 918	1,033 918	1,033 918	1,033 918	1,033 918	928	8265 7,344																												
MM1.1	348	11.2.8	<p>In accordance with London Plan paragraph 4.1.11, Merton’s target for the period 2029/30 to 2035/36 (3,466 total) is drawn from the 2017 SHLAA findings <u>and includes the rolling forward of the small sites target beyond 2029</u>. This sets a target for the period 2029/30 to 2033/34 of 2,370 and for 2034/35 to <u>2036/37 2035/36</u> of <u>1,644 1,096</u> as indicated in the following table:</p> <table border="1"> <thead> <tr> <th>Plan period</th> <th>Target</th> </tr> </thead> <tbody> <tr> <td>2029/30 - 2033/34</td> <td>2,370</td> </tr> <tr> <td><u>2034/35 – 2036/37 2035/36</u></td> <td><u>1,644 1,096</u></td> </tr> <tr> <td><u>2029/30 – 2036/37 2035/36</u></td> <td><u>4,014 3,466</u></td> </tr> </tbody> </table>	Plan period	Target	2029/30 - 2033/34	2,370	<u>2034/35 – 2036/37 2035/36</u>	<u>1,644 1,096</u>	<u>2029/30 – 2036/37 2035/36</u>	<u>4,014 3,466</u>	See above - initial MM1.1 at Page 14	September 2022 – in response to Stage 2 MIQs																									
Plan period	Target																																					
2029/30 - 2033/34	2,370																																					
<u>2034/35 – 2036/37 2035/36</u>	<u>1,644 1,096</u>																																					
<u>2029/30 – 2036/37 2035/36</u>	<u>4,014 3,466</u>																																					
MM1.1	349	Figure 4.2.1	<p><i>Figure 11.2.1 ‘Merton Housing Trajectory 2021/22 – 2036/37’ updated – refer to Appendix 2</i></p>	See above - initial MM1.1 at Page 14	September 2022 – in response to Stage 2 MIQs																																	
MM11.10b	352	11.2.19	<p>Due to the overwhelming need for permanent homes <u>and the limited availability of suitable sites to address this need compared to temporary accommodation</u>, we do not support <u>the change of use of permanent homes to non-permanent</u></p>	To improve clarity and	September 2022 – in																																	

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			<u>accommodation (such as temporary sleeping accommodation and short term rental residential accommodation) (either purpose built or converted) such as apart-hotels on sites that are suitable for permanent housing for a cumulative period of more than 90 days a year without seeking planning permission. The policy protects existing permanent homes from change of use to non-permanent accommodation (including timeshare, short-term lets, and temporary sleeping accommodation, as well as C1 uses which include hotels, guest houses and boarding houses, and hostels and bed and breakfast premises). Demand for non-permanent accommodation in the borough should be met from appropriate sites in non-residential use, rather than sites used for permanent housing.</u>	effectiveness of the Plan	response to Stage 2 MIQs
MM11.10c	353	11.2.22	As supported by the London Plan, Houses in Multiple Occupation (HMOs) contribute towards addressing needs. As with all homes, HMOs will be expected to meet good standards both for the occupiers and neighbours and we will have regard to relevant guidance in the assessment of HMOs including national guidance, the London Housing Design Standards, the GLA Housing Supplementary Planning Guidance.	To address issues raised by the Inspectors in MIQ (Matter 3, Issue 2, Question 5) and improve the soundness of the Plan	September 2022 – in response to Stage 2 MIQs
MM11.10d	355	11.3.1	<u>Policy H11.3 applies to all residential development proposals, irrespective of tenure type, for self-contained purpose-built flats, maisonettes, and houses.</u> Research in London and in Merton shows that there is an overwhelming need in London and in Merton for all types and sizes of new homes. Like much of London overcrowding exist in Merton which need to be eliminated.	To improve clarity of the Plan. <i>(Formerly additional modification AM11.12)</i>	September 2022 – in response to actions arising from Stage 1 Hearings
MM11.10d	355	11.3.3	Merton's SHNA sets out the size of housing required <u>by tenure</u>	To improve clarity and effectiveness of the Plan. <i>(Formerly additional modification AM11.13)</i>	September 2022 – in response to actions arising from Stage 1 Hearings
MM11.10d	355	Figure 4.3.1	Size of housing required 2017 - 2035 <u>by tenure</u>	To improve clarity and	September 2022 – in

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				effectiveness of the Plan. <i>(Formerly additional modification AM11.14)</i>	response to actions arising from Stage 1 Hearings
MM11.10d	355	11.3.5	In the affordable sector it is recognised the role which delivery of family <u>sized</u> homes can play in releasing supply of smaller properties for other households; together with the limited flexibility which one-bed properties offer to changing household circumstances which feed through into higher turnover and management issues.	To improve clarity of the Plan. <i>(Formerly additional modification AM11.15)</i>	September 2022 – in response to actions arising from Stage 1 Hearings
MM11.10d	355	11.3.9	This mix is informed by a number of factors, including, local housing needs research deliverability, viability, affordability, land availability and data concerning waiting lists.	To improve clarity of the Plan. <i>(Formerly additional modification AM11.16)</i>	September 2022 – in response to actions arising from Stage 1 Hearings
MM11.10d	356	11.3.11	Gated development may address security concerns; however, they restrict public access and therefore, choice. This is considered divisive as it reduces social, visual and physical permeability and actively works against engendering community and social cohesion.	To improve clarity of the Plan. <i>(Formerly additional modification AM11.17)</i>	September 2022 – in response to actions arising from Stage 1 Hearings
MM11.10d	356	11.5.3	Continued demand for family <u>sized</u> housing can be expected from newly forming households.	To improve clarity of the Plan. <i>(Formerly additional</i>	September 2022 – in response to actions arising from Stage 1 Hearings

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				<i>modification AM11.18)</i>	
MM11.10e	357	Policy 11.4 (a) (i)	<p>a. The suitability of proposals for supported care housing will be assessed having regard to the following criteria:</p> <p>i. Demonstrable need <u>Meeting an identified local need.</u></p>	To improve the clarity and effectiveness of the Plan	September 2022 – in response to Stage 2 MIQs
MM11.10e	357	Policy H11.4 (a) (vii)	i. The quality of accommodation complies with all relevant standards for that use.	To improve the clarity and effectiveness of the Plan	September 2022 – in response to Stage 2 MIQs
MM11.10e	359	11.4.6	We encourage the provision of non-institutionalised supported care housing with self-contained facilities for which there is demonstrable <u>meet an identified local</u> need.	To improve the clarity and effectiveness of the Plan	September 2022 – in response to Stage 2 MIQs
MM11.10e	360	11.4.13	We encourage proposals <u>Proposals must demonstrate that they cater for that</u> meet local needs identified in a Local Housing Market Assessment or in an appropriate needs assessment such as that of a recognised public body.	To improve the clarity and effectiveness of the Plan	September 2022 – in response to Stage 2 MIQs
MM11.10f	361	Policy (title) H11.5	Student Housing, other housing with shared facilities <u>such as HMOs</u> and bedsits	To improve the clarity and effectiveness of the Plan	September 2022 – in response to Stage 2 MIQs
MM11.10f	361	Policy H11.5(a)	a. The development of student housing, other housing with shared facilities <u>such as HMOs</u> and bedsits is supported provided that the development:	To improve the clarity and effectiveness of the Plan	September 2022 – in response to Stage 2 MIQs
MM11.10f	361	Policy H11.5(a) (v)	i. complies with all relevant standards for that use; and;	To improve the soundness of the Plan	September 2022 – in response to Stage 2 MIQs
MM11.10f	361	Policy 11.5(a) (vi)	vi. <u>and</u> is fully integrated into the residential surroundings.	To improve the clarity and soundness of the Plan	September 2022 – in response to Stage 2 MIQs

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM11.10f	361	Policy 11.5 (a) (vii)	vii caters for recognised educational establishments <u>is supported by evidence of a linkage with one or more higher education providers (HEP) in Merton or within a reasonable travelling distance of Merton. This evidence must include confirmation that the proposed rental levels for the student accommodation are supported by the linked HEP(s) and that the majority of the bedrooms in the development including all of the affordable student accommodation will be secured through a nominations agreement for occupation by students of one or more HEP, for the lifetime of the scheme, as required by London Plan policy H15:</u>	To improve the clarity and soundness of the Plan	September 2022 – in response to Stage 2 MIQs
MM11.10f	361	Policy H11.5 (a) (viii)	viii. — provides purpose built dedicated floorspace that is managed for cultural or arts studios or activities.	To improve the soundness of the Plan	September 2022 – in response to Stage 2 MIQs
MM11.10f	361	Policy 11.5(a) (xi)	is located in an area well served by public transport concerning the <u>students' place of study linked with one or more higher education providers (HEP) recognised higher educational establishment # the student housing</u> serves; ;	To improve the clarity and soundness of the Plan	September 2022 – in response to Stage 2 MIQs
MM11.10f	362	H11.5(a) (xiii)	has an ownership or management arrangement secured by legal agreement in place with the recognised higher educational establishment <u>students' place of study linked with one or more higher education providers (HEP) # the student housing</u> serves; and,	To improve the clarity and soundness of the Plan	September 2022 – in response to Stage 2 MIQs
MM11.10f	361	Policy 11.5	<ul style="list-style-type: none"> Deletion of full stop and replacement with semi colon at the ends of Policy 11.5 (a) bullet points:(i), (ii), (iii), (iv), (ix), (x), (xi), (xii), Deletion of full stop and replacement with colon at the end of sentence immediately following Policy 11.5 (a) (vi) as follows: 	To improve the clarity and soundness of the Plan	September 2022 – in response to Stage 2 MIQs

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			Additionally, with regards to student housing-:		
MM11.10f	362	Policy H11.5(b)	<p>b. We will resist development which results in the net loss of student housing and other housing with shared facilities <u>such as HMOs</u> and bedsits unless either it can be demonstrated that:</p> <p>i. there is a surplus of the existing accommodation in the area; or,</p> <p>ii. the existing accommodation is incapable of meeting relevant standards for accommodation of this type- or,</p> <p>iii. <u>it provides permanent residential accommodation.</u></p>	To improve the clarity and effectiveness of the Plan	September 2022 – in response to Stage 2 MIQs
MM11.10f	362	Policy H11.5(c)	<p>c. Where we are satisfied that the development results in the net loss of student housing, other housing with shared facilities <u>such as HMOs</u> or bedsits, is justified, we will require that an equivalent amount of residential floorspace or permanent self-contained housing in Use Class C3 to be provided and these proposals will be considered in respect to Strategic Policy H11.1 Housing Choice.</p>	To improve the clarity and effectiveness of the Plan	September 2022 – in response to Stage 2 MIQs
MM11.10f	363	11.5.2	<p>A recognised higher educational establishment generally refers to those funded by the Higher Education Funding Council for England (HEFC). Students' place of study linked with one or more higher education providers (HEP) include Wimbledon College of Art, Wimbledon <u>which</u> is found <u>located</u> within Merton. Additionally, there are several higher education establishments <u>others</u> found wholly or partly within neighbouring south London boroughs which are Kingston University, Roehampton University, St George's Medical School and St Mary's University College Twickenham. <u>Requiring proposals for student accommodation to have ownership or management agreements in place with students' place of study linked with one or more higher education providers (HEP) helps</u></p>	To improve the clarity and effectiveness of the Plan	September 2022 – in response to Stage 2 MIQs

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			<u>demonstrate there is a need for the proposal and ensure that it supports London Higher Education Providers (HEPs) as defined in London Plan footnote 77.</u>		
MM11.10f	363	11.5.6	There is an overwhelming need to provide additional conventional housing in Merton. It is considered that set within this challenging context, the requirement for student accommodation to caters for <u>students' place of study linked with one or more higher education providers (HEP) recognised educational establishments</u> within Merton or neighbouring south London boroughs of Croydon, Lambeth, Kingston-upon-Thames, Richmond, Sutton and Wandsworth strikes a suitable balance towards meeting the Mayor's strategic and local requirements for student housing, whilst minimising the compromise on Merton's capacity for conventional homes.	To improve the clarity and effectiveness of the Plan	September 2022 – in response to Stage 2 MIQs
MM11.10f	363	New paragraph below para 11.5.6	<u>When considering whether a proposal for student accommodation would compromise capacity to meet the need for conventional dwellings in the borough the council will have regard to the following factors:</u> <ul style="list-style-type: none"> - <u>whether the proposal would displace C3 residential accommodation;</u> - <u>whether the proposal site has been allocated for housing;</u> - <u>whether a site has been identified in the London SHLAA and/or Local Plan housing trajectory as having capacity for conventional housing or</u> - <u>has an extant or historic planning permission for C3 housing.</u> 	To improve the clarity and effectiveness of the Plan	September 2022 – in response to Stage 2 MIQs
MM11.10f	363	New paragraph below para 11.5.6	<u>We consider the most appropriate sites for student accommodation proposals to be well connected locations with good levels of access to public transport (PTAL 4 or higher) including those supported by good walking and cycling infrastructure and where student residents have access to a wide range of services and facilities within a 15-minute walking distance. Such proposals are also supported where the development is capable of having good access to public transport and facilities as a result of proposed transport improvements, including through a package of measures that the proposal would deliver. It is considered that</u>	To improve the clarity and effectiveness of the Plan	September 2022 – in response to Stage 2 MIQs

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			<u>applicants should give priority during the site selection process to locations in proximity to the institutions that the development will serve.</u>		
MM11.10f	364	11.5.7	<p>Housing with shared facilities form a significant part of the private rented stock in Merton. The precise definition of housing with shared facilities <u>such as HMOs</u> and bedsits is complex but includes the following groups:</p> <ul style="list-style-type: none"> • A bedsit where the bathroom is shared with tenants of other bedsits. • A flat in a house whether bathroom facilities may or may not be shared with other tenants. • A room in a shared house <u>such as HMOs</u> where the bathroom and kitchen facilities are shared with the tenants of the other rooms, but the tenants do not live with the other tenants as part of a 'household', for example don't cook for one another and eat together like a family would. • Rented rooms provided by a resident landlord. • Bed and breakfast hostels. 	To improve the clarity and effectiveness of the Plan	September 2022 – in response to Stage 2 MIQs
MM11.10f	364	11.5.8	In line with the London Plan, we will resist the loss of permanent self-contained homes including its loss from conversion to short-stay accommodation intended for occupation for periods of less than 90 days.	To improve clarity and effectiveness of the Plan	September 2022 – in response to Stage 2 MIQs
MM11.10f	364	11.5.9	Student housing, other housing with shared facilities <u>such as HMOs</u> and bedsits are often associated with a concentration of relatively short-term residents.	To improve clarity and effectiveness of the Plan	September 2022 – in response to Stage 2 MIQs
MM11.10f	365	11.5.12	Student housing developments will also be expected to provide adequate floorspace, usually on the ground floor of the development, which has favourable management terms for cultural or arts studios or other activities. Wimbledon School of Art is Merton's only third-level education provider, affiliated to the University of the Arts, London. We will encourage developer to work with specialist organisations that rent and manage floorspace dedicated arts and cultural activities.	To improve the soundness of the Plan	September 2022 – in response to Stage 2 MIQs

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM11.11	366	Policy H11.6 e	The suitability of ground conditions, particularly in respect to the potential to flooding. <u>Please also refer to policies contained in Chapter 15 (Green and Blue Infrastructure) including policies F15.7; F15.8 and F15.9.</u>	To improve clarity and soundness of the Plan	May 2022-response to Inspectors' Matters, Issues and Questions
MM11.12	366	Policy H11.6 f	The need or demand for accommodation provision and the available capacity on existing sites in the borough.	To improve clarity of the Plan	May 2022-response to Inspectors' Matters, Issues and Questions
MM11.13	366	Policy H11.6, new criterion	<u>The provision of a high standard of amenity for future occupants of sites particularly in terms of residential amenity, noise and air quality. Please also refer to policies contained in Chapter 12 (Places and Spaces in a Growing Borough) and Chapter 15 (Green and Blue Infrastructure) including policies F15.7 to F15.10.</u>	To improve clarity and soundness of the Plan	May 2022-response to Inspectors' Matters, Issues and Questions
MM11.13a	368	11.6.6	Whilst As a result, the implications for the 2019 Study findings <u>identified regarding the need for 6 additional pitches in Merton neither the 2021 London Plan or PPTS requires specific allocations to be made to meet this need. are no longer valid. Policy H11.6 applies to all Gypsies and Travellers regardless of whether they meet the PPTS definition.</u>	To improve clarity and soundness of the Plan	September 2022 – in response to actions arising from Stage 1 Hearings
MM11.14	368	New supporting para following existing para 11.6.6	<u>The extent of provision of appropriate on-site facilities will be determined on a site-by-site basis proportionate to the size of the proposed site to ensure that any extra provision meets their needs and takes account of the size of the site and the needs and demographics of the families resident on them.</u>	To improve clarity and soundness of the Plan	May 2022-response to Inspectors' Matters, Issues and Questions September 2022 – in response to actions arising from Stage 1 Hearings
MM11.15	369	Policy 11.7 part g	<u>Any affordable housing secured to those on the council's housing list as a result of the build to rent scheme operator, working with the council and agreeing to do so. The council's nomination rights to secure nomination of tenants to specified affordable homes and the management and monitoring arrangements</u> will be	To improve clarity and soundness of the Plan	September 2022 – in response to Stage 2 MIQs

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			secured via planning obligation (s106 legal agreements) or other appropriate legal deed. All affordable housing elements of the scheme must be affordable in perpetuity.		
MM11.16	369	Policy 11.7 part h	A clawback mechanism must be in place that ensures that where any of the Built to Rent homes are sold within the 15 years this will trigger a penalty charge towards affordable housing provision in accordance with Policy <u>H11.7(f)</u> H4.7(f) .	To improve clarity of the Plan	September 2022 – in response to Stage 2 MIQs
MM11.17	371	11.7.4	By having nomination rights, we will help to ensure that prospective tenants have been appropriately vetted as in genuine need in terms of the inability to access rented accommodation on the open market locally.	To improve clarity and soundness of the Plan	September 2022 – in response to Stage 2 MIQs
MM11.18	371	New paragraph below 11.7.4	<u>A clawback mechanism will be applied in accordance with London Plan policy and national Planning Practice Guidance (PPG) on Build to Rent to protect the value of affordable housing provision that is withdrawn if affordable housing units in Build to Rent blocks are converted to another tenure after the expiry of the covenant period.</u>	To improve clarity and soundness of the Plan	September 2022 – in response to Stage 2 MIQs
MM1.1	373	Places & Spaces in a Growing Borough, Introduction, 2 nd paragraph	The need to deliver more than 10,000 homes in Merton by 2036/ <u>37</u> does not outweigh the need for developments to be design-led. The Council will require all development to be of the highest design quality and contribute to the Merton's long-term economic prosperity, quality of life and a net zero carbon future.	See above - initial MM1.1 at page 14.	March 2022 – response to Inspectors' preliminary matters
MM2.2	374	Policy D12.1 Delivering well designed and resilient neighbourhoods, part a	Be designed according to well established principles of good urban design as referred to in the National Planning Policy Framework (NPPF) and practice guidance, development plan policies and <u>have regard to</u> existing and emerging good practice guidance.	See above - initial MM2.2 at page 42.	March 2022 – response to Inspectors' preliminary matters
MM12.0	374	Policy D12.1 Delivering well designed and resilient neighbourhoods, part a	Be designed according to well established principles of good urban design as referred to in the National Planning Policy Framework (NPPF) and practice guidance, development plan policies and <u>have regard to</u> (MM2.2) existing and emerging policy guidance. and good practice guidance.	To improve clarity	September 2022 – in response to Stage 2 MIQs

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM2.2	375	Policy D12.1 Delivering well designed and resilient neighbourhoods, part g	Conserve and enhance Merton's heritage assets and distinctive character using Merton specific guidance, such as Merton's Borough Character Study and Conservation Area Appraisals.	See above - initial MM2.2 at page 42.	March 2022 – response to Inspectors' preliminary matters
MM12.0	376	New paragraph below 12.1.1	<u>Similar to Merton's Supplementary Planning Documents, many statutory bodies, such as the Greater London Authority, Historic England and Sport England produce policy guidance, such as London Plan guidance and Good Practice Advice notes. These provide detailed guidance and advice on a wide range of issues that support the implementation of relevant legislation and national and regional planning policy. These guidance documents can help inform the design of development proposals.</u>	See above – initial MM12.0 at page 374	September 2022 – in response to Stage 2 MIQs
MM2.2	378	Policy D12.2 Urban design, part a	Be of the highest standard and have regard adhere to the most appropriate policy guidance and best practice.	See above - initial MM2.2 at page 42.	March 2022 – response to Inspectors' preliminary matters
MM12.0	378	Policy D12.2 Urban design, part a	Be of the highest standard and have regard adhere (MM2.2) to the most appropriate policy guidance and best practice.	See above – initial MM12.0 at page 374	September 2022 – in response to Stage 2 MIQs
MM12.0a	380	Policy D12.2 Urban design, part h	Be economically and socially sustainable, by offering variety and choice, and by being able to adapt to changing climatic, social, technological and economic conditions without minimising the need for future remedial intervention.	To improve effectiveness.	September 2022 – in response to Stage 2 MIQs
MM12.0b	380	Policy D12.2 Urban design, part m	Consider on larger sites or locally significant sites sites within Town Centre boundaries, the benefits of temporary uses before and during construction stages.	To improve clarity	September 2022 – in response to Stage 2 MIQs
MM2.2	380	Policy D12.2 Urban design, part q	Prioritise pedestrians and cyclists and encourage greater walking and cycling for all around the area in accordance with Transport for London (TfL) Healthy Streets Approach.	See above - initial MM2.2 at page 42.	March 2022 – response to Inspectors' preliminary matters

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM12.0c	380	Policy D12.2 Urban design, new criteria below part v	<u>Ensure that the maintenance and management of any proposed public realm is considered. Planning obligations may be used to deliver this.</u>	For effectiveness and to ensure the Plan is justified.	September 2022 – in response to Stage 2 MIQs
MM1.1a	383	12.2.5	The design of new buildings, particularly taller buildings, on sites in close proximity to designated open spaces and MOL needs to consider the amenity, quality and use of the open space.	See above - initial MM1.1a at Page 14	September 2022 – in response to actions arising from Stage 1 Hearings
MM2.2	383	New paragraph below 12.2.9	<u>Transport for London's (TfL) Healthy Streets Approach provides information and guidance on how best to prioritise walking and cycling.</u>	See above - initial MM2.2 at page 42.	March 2022 – response to Inspectors' preliminary matters
MM12.0c	384	New paragraph below 12.2.11	<u>The long-term maintenance and management of public realm should be considered from the start of the design process and should be designed in consultation with the council.</u>	See above – initial MM12.0c at page 380	September 2022 – in response to actions arising from Stage 1 Hearings
MM12.0d	387	Policy 12.3 Ensuring high quality design for all developments, part g	Protect <u>Ensure</u> Demonstrate how new and existing development <u>minimises their impact on privacy from visual intrusion</u> , noise, vibrations or pollution so that the living conditions of existing and future occupiers are not unduly diminished.	To improve clarity and effectiveness	September 2022 – in response to Stage 2 MIQs
MM12.0e	387	Policy 12.3 Ensuring high quality design for all developments, part i	In <u>major</u> residential developments, provide an area of communal amenity space in addition to requirements for private amenity space. Site layout, privacy, overlooking and daylight/sunlight requirements should be used to determine the appropriate amount, location, shape and design of such space.	To improve clarity and effectiveness.	September 2022 – in response to Stage 2 MIQs
MM12.0f	387	Policy 12.3 Ensuring high quality	Provide outdoor amenity space <u>that meet, or exceed, the standards set out in the London Plan and whether public, private or communal which accords with appropriate minimum standards</u> , is efficiently laid out and is compatible with the	To improve clarity, for consistency with	September 2022 – in

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
		design for all developments, part n	character of surrounding areas. <u>In exceptional circumstances where it is not possible to meet the minimum private amenity standards, the remainder should be supplied in the form of communal amenity space.</u>	the London Plan and in response to Stage 2 MIQs Matter 12 Q10 and Q12.	response to Stage 2 MIQs
MM12.0f	388	Policy 12.3 Ensuring high quality design for all developments, part q	Where developments are propose houses and/or ground floor maisonettes/duplex units, require a garden with a minimum area of 50m2 as a single useable regular shaped <u>private</u> amenity space <u>is required</u> . Flexibility may be applied <u>where applicants can demonstrate the site is constrained.</u> to constrained sites and higher density development where justified.	See above – initial MM12.0f at page 387	September 2022 – in response to Stage 2 MIQs
MM2.2	388	Policy 12.3 Ensuring high quality design for all developments, part s	Provide well-designed cycle parking in accordance with London Plan minimum standards and TfL's London Cycle Design Standards that is well integrated with the overall design approach of the development and does not negatively impact on the primary street elevation.	See above - initial MM2.2 at page 42.	March 2022 – response to Inspectors' preliminary matters
MM2.2	388	Policy 12.3 Ensuring high quality design for all developments, part u	Ensure that the design and management of facilities for recycling, storage and disposal of household waste <u>is designed to ensure efficient and effective waste collection, is well designed and is considered as in accordance with Merton's Waste and Recycling Storage Requirements and is</u> part of the overall design approach and does not adversely affect the primary building function, appearance of the building and character of the street.	See above - initial MM2.2 at page 42.	March 2022 – response to Inspectors' preliminary matters
MM12.0g	391	New paragraph below 12.3.1	<u>Design and Access Statements (DAS) are a short report that accompanies a planning application. They must explain the design principles and concepts that have informed the development and also demonstrate how the development's context has influenced the design. The level of detail in a DAS should be proportionate to the scale and type of the application. Merton's Small Sites Toolkit SPD contains a DAS template that applicants may use to assist applications on small sites.</u>	To support and add further clarity to the policy.	September 2022 – in response to Stage 2 MIQs
MM2.2	391	New paragraph below 12.3.6	<u>TfL's London Cycle Design Standards provides requirements and advice for the design of dedicated cycle infrastructure.</u>	See above - initial MM2.2 at page 42.	March 2022 – response to Inspectors' preliminary matters

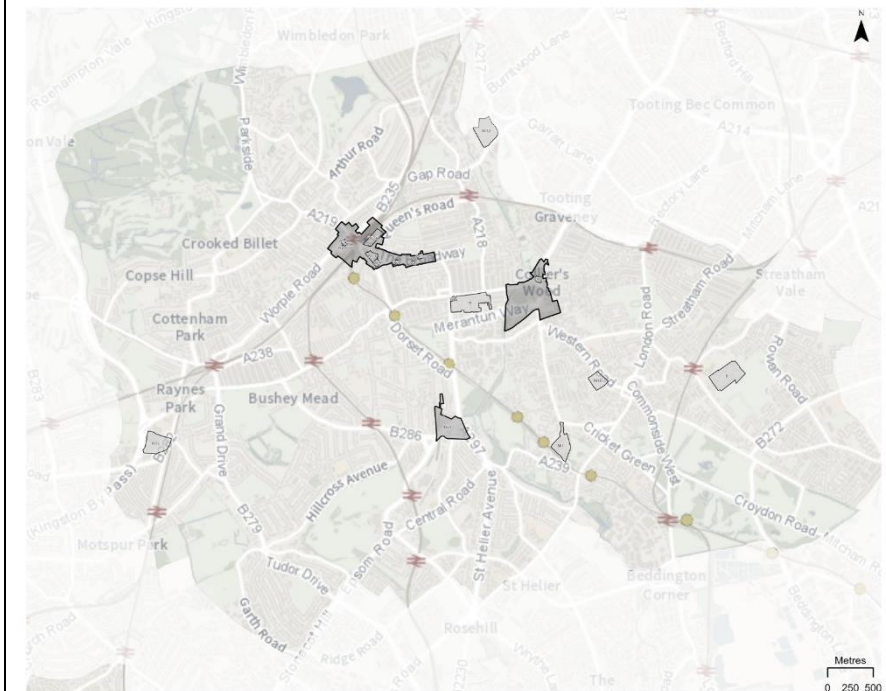

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM12.0h	391	New paragraph below 12.3.6	<u>Communal amenity should be multifunctional; designed for playing, socialising and relaxing and if outdoors be green and biodiverse. They should provide sufficient space to meet the requirements of the number of residents. Flexibility may be applied if developments can demonstrate how the amount of amenity space provided is acceptable taking into account factors such as the developments location, access to open spaces and the access and quality of private amenity spaces. In these cases, the quality of any communal space will need to be high.</u>	Supporting text added to support policy 12.3.i, 12.3.n and 12.3.q	September 2022 – in response to Stage 2 MIQs
MM2.2	393	New paragraph below 12.3.13	<u>Merton's Waste and Recycling Storage Requirements sets out guidance on the siting and design of waste and recycling facilities so that waste collection services in Merton can efficiently collect and dispose of household and other waste and recycling.</u>	See above - initial MM2.2 at page 42.	March 2022 – response to Inspectors' preliminary matters
MM12.0i	394	12.3.21	However, inappropriate and unnecessary lighting or lighting which is insensitively used can adversely affect amenity in terms of light pollution to neighbouring occupiers and to the night sky. When considering light proposals the council will seek ensure that unacceptable levels of illumination are controlled by conditions or that unacceptable proposals are refused planning permission	To ensure the plan is justified	September 2022 – in response to Stage 2 MIQs
MM12.0j	402	Policy D12.5 Managing heritage assets	Merton has a wealth of heritage assets including conservation areas, listed buildings and structures and scheduled ancient monuments. This policy aims to conserve and enhance Merton's heritage assets, their <u>significance</u> , settings and distinctive <u>local</u> character. a. Development proposals affecting a heritage asset or its setting will be <u>assessed against the required to be in accordance with the (MM12.0j) following criteria-(MM2.2)</u>	To improve consistency with the London Plan and NPPF and to make the plan more effective. In response to Stage 2 MIQ Matter 12, issue ii	September 2022 – in response to Stage 2 MIQs
MM2.2	402	Policy D12.5 Managing heritage assets, part a	Development proposals affecting a heritage asset or its setting will be required to be in accordance with the following criteria: i. principles set out in the National Planning Framework 2019 and 2021 draft (MM2.1) and the detailed guidance set out in the accompanying Historic Environment Planning Practice Guide, and the London Plan, and Historic England guidance; ii. Merton's published Conservation Area character appraisals and management plans and the guidance statements set out in the Borough Character Study.	See above - initial MM2.2 at page 42.	28 March 2022
MM2.1	402	Policy D12.5 Managing	Principles set out in the National Planning Framework 2019 and 2021 draft and the detailed guidance set out in the accompanying Historic Environment Planning	See above - initial MM2.1 at	March 2022 – response to

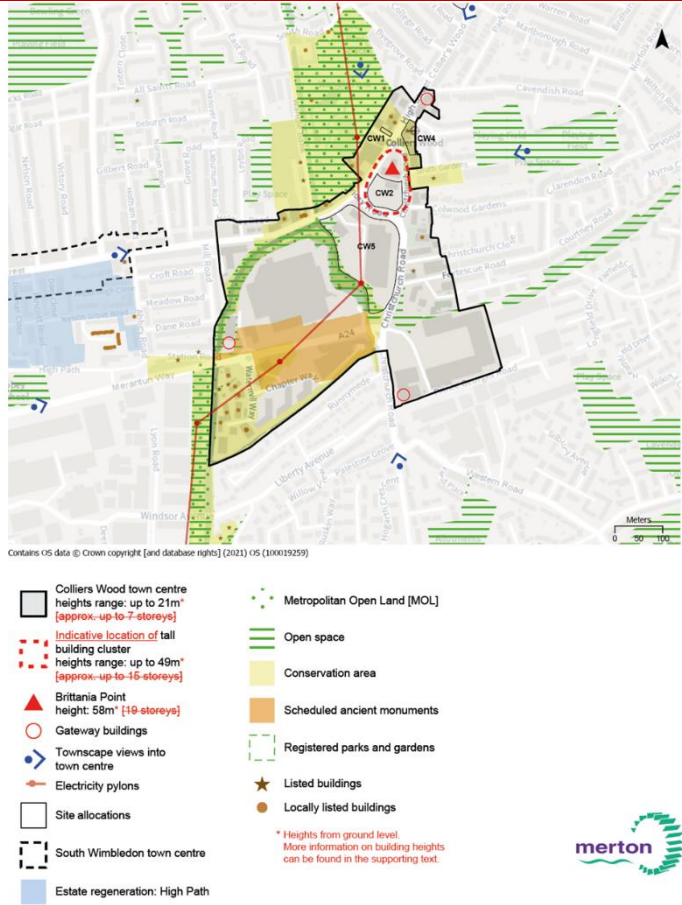
Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
		heritage assets, part a	Practice Guide, the London Plan, and Historic England guidance;	Page 35 Plan Ref. 2.1.1	Inspectors' preliminary matters
MM12.0j	402	Policy D12.5 Managing heritage assets, part b	All development proposals <u>associated with the potential to impact the significance or setting of the</u> borough's heritage assets <u>or their setting</u> will be expected to demonstrate, within a Heritage Statement, how the proposal conserves, and where <u>appropriate possible</u> enhances the significance of the asset in terms of its <u>individual</u> architectural or historic interest and its setting.	See above - initial MM12.0j at page 402	September 2022
MM12.0j	402	Policy D12.5 Managing heritage assets, part c	In accordance with the NPPF, any alteration or destruction of a heritage asset, or development that has an impact on the <u>significance and/or</u> setting of a heritage asset will require clear and convincing justification. Substantial harm to or loss of:	See above - initial MM12.0j at page 402	September 2022
MM12.0j	402	Policy D12.5 Managing heritage assets, part e	The loss of a building that makes a positive contribution to a conservation area or <u>heritage site setting and/or significance of a heritage asset should be avoided and will not be supported unless the applicant can demonstrate there is substantial public benefit that outweighs the harm. In the event of substantial harm, the proposal will need to satisfy the criteria set out in National Policy and guidance. also be treated as substantial harm to a heritage asset.</u>	See above - initial MM12.0j at page 402	September 2022
MM12.0j	403	Policy D12.5 Managing heritage assets, part f (i)	Proposals affecting <u>the layout, design, character, use and function of both designated and non-designated a</u> heritage assets or its setting should conserve and enhance the significance of the asset as well as its <u>setting surroundings</u> and have regard to the following: i. The conservation, or reinstatement <u># of</u> lost, of features that contribute to the asset or its setting. This may include original chimneys, windows and doors, boundary treatments and garden layouts, roof coverings or shop fronts. In listed buildings, internal features such as fireplaces, panelling, ceilings, doors and architraves as well as <u>surface treatments</u> , the proportion of individual rooms <u>and historic layout</u> may also be of significance.	See above - initial MM12.0j at page 402	September 2022
MM12.0j	403	Policy 12.5.g	Proposals to existing heritage assets <u>s buildings</u> should seek to improve the proposals energy efficiency effectively and sensitively and without detrimental visual impact on the heritage asset, or <u>the wider significance and</u> setting of the heritage asset.	See above - initial MM12.0j at page 402	September 2022
MM2.2	404	New paragraph below 12.5.2	<u>Historic England provides detailed guidance on best practice approaches when working with heritage assets. Merton's published Conservation Area character appraisals and management plans and the guidance statements set out in the Borough Character Study also provide borough specific guidance when working with heritage assets.</u>	See above - initial MM2.2 at page 42.	March 2022 – response to Inspectors' preliminary matters

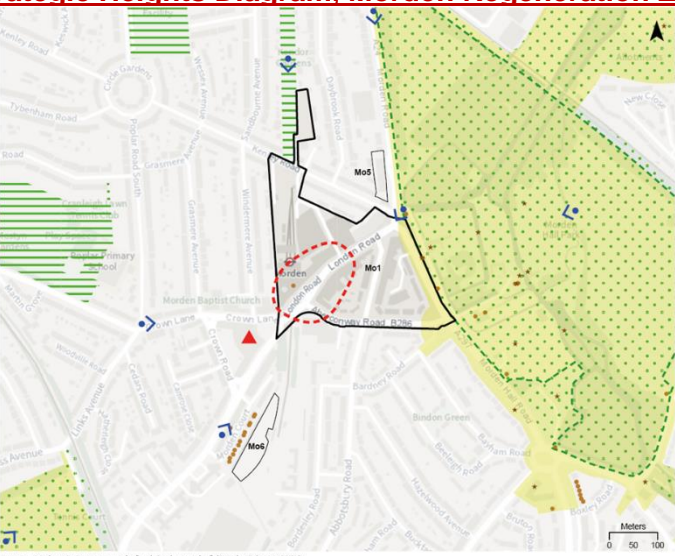

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM12.0k	405	12.5.5	The identification of a heritage asset could be through a range of means. This could include formal designation such as conservation area or listed, or locally listed building status. Buildings in a conservation area identified as having a positive contribution to its character will be considered as non-designated heritage assets in their own right, <u>if they meet Merton's local listing selection criteria</u> . Heritage assets may also be identified <u>in</u> the borough character study, <u>during the update on the local list</u> , or during the development control process itself.	To improve clarity and soundness of the Plan	September 2022 – in response to Stage 2 MIQs
MM12.0j	406	12.5.7	Heritage statements will be required to set out how proposals conserve, enhance or restore <u>the significance of</u> heritage assets and where appropriate, conservation management plans should be prepared for the future maintenance and management of the asset.	See above - initial MM12.0j at page 402	September 2022
MM12.0j	406	12.5.8	The level of detail provided in the heritage statement should be proportionate to the asset's importance in terms of the significance of the asset affected and the impact of the proposal. Where the proposal has <u>the potential to cause substantial harm to a substantial impact on</u> the significance of a heritage asset, it should be carried out by a specialist historic environment consultant.	See above - initial MM12.0j at page 402	September 2022
MM12.0j	407	12.5.14	In the past there has been tension between the requirements to improve the energy performance and reduce carbon from buildings that are or that are located within heritage assets and the need to conserve these historic assets. The council is supportive of efforts to tackle the climate emergency and will positively consider proposals for retrofitting <u>heritage assets, including structures within Conservation Areas, where the proposals will not cause harm to the significance of the heritage asset. Where proposals would cause harm to the significance of a heritage asset or its setting applications will be assessed against National Policy and Guidance, buildings that are themselves or within heritage assets, where these proposals do not cause substantial harm to the heritage assets.</u>	See above - initial MM12.0j at page 402	September 2022
MM3.1	408	Policy D12.6 Tall Buildings, text	Proposals for tall buildings are most suitable in town centre locations with good access to public transport such as Colliers Wood town centre, Wimbledon town centre and the Wider Morden Town Centre Area. They can also be suitable on sites that can demonstrate that they are suitable for tall buildings through thorough townscape analysis and a masterplan approach to design and delivery. Tall buildings must be appropriately sized and located and will be appraised case by case. <u>Tall buildings are only acceptable in the following locations:</u> a. <u>As set out within the Strategic Heights Diagrams for Colliers Wood town centre, Morden Regeneration Zone and Wimbledon town centre.</u>	See above – Initial MM3.1 at Page 81 Plan Ref. Policy N3.1 and to add clarity to three site allocations outside town centres (Mi1; Mi16 and RP3)	November 2021 – for submission

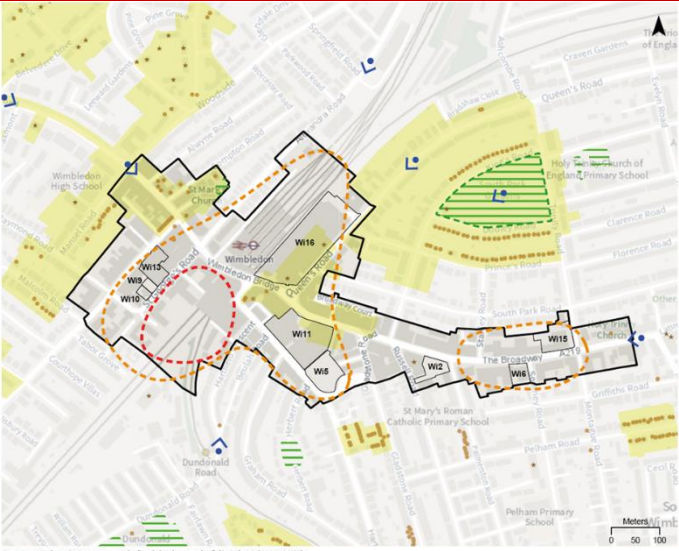
Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			<p>b. <u>Wimbledon town centre, as set out within the chapter on Wimbledon.</u></p> <p>c. <u>Morden Regeneration Zone, as set out within the chapter on Morden and site allocation Mo4.</u></p> <p>d. <u>Colliers Wood, as set out within the chapter on Colliers Wood and within the site allocation CW2.</u></p> <p>e. <u>Within Merton's adopted Estates Local Plan 2018.</u></p> <p>f. <u>Where they are identified in the following site allocations: CW2, Mi1, Mi11, Mi16, Mo1, RP3, Wi2, Wi5, Wi6, Wi9, Wi10, Wi11, Wi12, Wi13, Wi15 and Wi16.</u></p> <p>The council will generally support tall buildings where:...</p>	<p>To ensure that the policy is justified and legally sound, all policy requirements to conform to guidance have been removed or amended.</p> <p>Re-added after accidental removal from 2 March 2022 draft - 0D4ai</p>	<p>March 2022 – response to Inspectors' preliminary matters</p> <p>28 March 2022</p>
MM2.2	408	Policy D12.6 Tall Buildings, part d	They are informed by <u>have had regard to</u> the most up to date and relevant council supplementary planning documents, guidance, policy and site allocations.	See above - initial MM2.2 at page 42.	March 2022 – response to Inspectors' preliminary matters
MM3.1	408	Policy D12.6 Tall Buildings, text	We The council (AM12.28) will generally support tall buildings <u>in those locations set out in part 1 of this policy</u> where:	See above – Initial MM3.1 at Page 81 Plan Ref. Policy N3.1 and to add clarity to three site allocations outside town centres (Mi1; Mi16 and RP3)	28 March 2022
MM12.0I	408	Policy D12.6 Tall Buildings part a, b and c	a. Their massing, bulk and height are appropriately sized and located and demonstrate they do not undermine <u>take into account</u> local character and heritage assets and their settings through townscape analysis of short, mid and long views, taking into account individual and cumulative effects.	to set a positive strategy for the historic environment and effectiveness, and to better	September 2022 – in response to actions arising from Stage 1 Hearings

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			<p>b. They enhance <u>avoid harm to</u> the setting and <u>significance of /or relationship with</u> neighbouring heritage assets.</p> <p>c. They are of exceptional <u>exemplary</u> design and architectural quality.</p>	align with the language of the NPPF, London Plan. Modifications have been made in consultation with Historic England and captured in a Statement of Common Ground between Merton Council and Historic England.	
MM3.1	409	Policy D12.6 Tall Buildings, part p-r	<p>p. They're within Wimbledon town centre, as set out in the Future Wimbledon supplementary planning document.</p> <p>q. They are within Morden, as set out and site allocation Mo4.</p> <p>r. They are within Colliers Wood, as set out within the site allocation CW2.</p>	<p>See above – Initial MM3.1 at Page 81 Plan Ref. Policy N3.1 and to add clarity to three site allocations outside town centres (Mi1; Mi16 and RP3)</p> <p>Re-added after accidental removal from 2 March 2022 draft - 0D4ai</p>	<p>November 2021 – for submission</p> <p>28 March 2022</p>
MM12.0I	410	Policy D12.6 Tall Buildings, new criterion before part s	<p>Development proposals for tall buildings should be supported by:</p> <p><u>Adequate information demonstrating how the proposals comply with all the criteria within section 2 of this policy, and within the London Plan policy on tall buildings to ensure that the proposal have considered visual, townscape and heritage impacts.</u></p>	See above – Initial MM12.0I at page 408.	September 2022 – in response to actions arising from Stage 1 Hearings

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM3.1	410	Policy D12.6 Tall Buildings	<p data-bbox="539 183 1198 215"><i>Diagram to be added at the end of the policy text:</i></p> <p data-bbox="539 215 1630 287"><u>Map of appropriate locations for tall buildings (illustrating Policy D12.6 part 1 (a-f))</u></p>  <p data-bbox="539 981 952 1005">Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)</p> <ul data-bbox="539 1029 952 1133" style="list-style-type: none"> Town Centre boundaries [Colliers Wood, Morden Regeneration Zone & Wimbledon] Relevant site allocations and estates local plan boundaries 	See above – Initial MM3.1 at Page 81 Plan Ref. Policy N3.1 and to add clarity to three site allocations outside town centres (Mi1; Mi16 and RP3)	28 March 2022

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM3.1	410	Policy D12.6 Tall Buildings	<p><i>Diagram to be added at the end of the policy text:</i> <u>Strategic Heights Diagram, Colliers Wood town centre</u></p> 	<p>See above – Initial MM3.1 at Page 81 Plan Ref. Policy N3.1 and to add clarity to three site allocations outside town centres (Mi1; Mi16 and RP3)</p> <p>Re-added after accidental removal from 2 March 2022 draft – 0D4ai</p> <p>Removal of 'storeys heights' to improve clarity.</p>	<p>November 2021 – for submission</p> <p>28 March 2022</p> <p>September 2022 – in response to actions arising from Stage 1 Hearings</p>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM3.1	410	Policy D12.6 Tall Buildings	<p><i>Diagram to be added at the end of the policy text:</i> <u>Strategic Heights Diagram, Morden Regeneration Zone</u></p>  <p>Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)</p> <ul style="list-style-type: none"> Morden Regeneration Zone heights range: up to 39m* [approx. up to 12 storeys] Indicative location of tall building cluster heights range: up to 71m* [approx. up to 22 storeys] Morden Civic Centre approx height: 58m* [16 storeys] Townscapes views into town centre Site allocations Metropolitan Open Land [MOL] Open space Conservation area Registered parks and gardens Listed buildings Locally listed buildings <p>* Heights from ground level. More information on building heights can be found in the supporting text.</p> 	<p>See above – Initial MM3.1 at Page 81 Plan Ref. Policy N3.1 and to add clarity to three site allocations outside town centres (Mi1; Mi16 and RP3)</p> <p>Re-added after accidental removal from 2 March 2022 draft – 0D4ai</p> <p>Removal of ‘storeys heights’ to improve clarity.</p>	<p>November 2021 – for submission</p> <p>28 March 2022</p> <p>September 2022 – in response to actions arising from Stage 1 Hearings</p>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM3.1	410	Policy D12.6 Tall Buildings	<p><i>Diagram to be added at the end of the policy text:</i> <u>Strategic Heights Diagram, Wimbledon town centre</u></p>  <p>Contains: OS data © Crown copyright [and database rights] (2021) OS (100019259)</p> <p>Wimbledon town centre heights range: up to 24m* [approx. up to 6 storeys]</p> <p>Indicative location of tall building cluster heights range: up to 48m* [approx. up to 12 storeys]</p> <p>Indicative location of tall building cluster heights range: up to 40m* [approx. up to 10 storeys]</p> <p>Townscapes views into town centre</p> <p>Site allocations</p> <p>Metropolitan Open Land [MOL]</p> <p>Open space</p> <p>Conservation area</p> <p>Registered parks and gardens</p> <p>Listed buildings</p> <p>Locally listed buildings</p> <p>* Heights from ground level. More information on building heights can be found in the supporting text.</p> <p>merton</p>	<p>See above – Initial MM3.1 at Page 81 Plan Ref. Policy N3</p> <p>Removal of ‘storeys heights’ to improve clarity.</p>	<p>November 2021 – for submission</p> <p>September 2022 – in response to actions arising from Stage 1 Hearings</p>
MM12.0m	411	New paragraph below 12.6.2	<p><u>Storey heights will differ across different land uses as well as different methods of construction. The table below provides indicative building heights based on residential and commercial uses.</u></p>	<p>Text and table added to improve clarity and ensure that the policy is justified.</p>	<p>September 2022 – in response to actions arising from Stage 1 Hearings</p>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made																																	
			<table border="1"> <thead> <tr> <th>Building storeys</th> <th>Indicative residential building height (metres) (3.2m floor to floor)</th> <th>Indicative commercial building height (metres) (4.0m floor to floor)</th> </tr> </thead> <tbody> <tr><td>1</td><td>3.2</td><td>4.0</td></tr> <tr><td>2</td><td>6.4</td><td>8.0</td></tr> <tr><td>3</td><td>9.6</td><td>12.0</td></tr> <tr><td>4</td><td>12.8</td><td>16.0</td></tr> <tr><td>5</td><td>16.0</td><td>20.0</td></tr> <tr><td>6</td><td>19.2</td><td>24.0</td></tr> <tr><td>7</td><td>22.4</td><td>28.0</td></tr> <tr><td>8</td><td>25.6</td><td>32.0</td></tr> <tr><td>9</td><td>28.8</td><td>36.0</td></tr> <tr><td>10</td><td>32.0</td><td>40.0</td></tr> </tbody> </table>	Building storeys	Indicative residential building height (metres) (3.2m floor to floor)	Indicative commercial building height (metres) (4.0m floor to floor)	1	3.2	4.0	2	6.4	8.0	3	9.6	12.0	4	12.8	16.0	5	16.0	20.0	6	19.2	24.0	7	22.4	28.0	8	25.6	32.0	9	28.8	36.0	10	32.0	40.0		
Building storeys	Indicative residential building height (metres) (3.2m floor to floor)	Indicative commercial building height (metres) (4.0m floor to floor)																																				
1	3.2	4.0																																				
2	6.4	8.0																																				
3	9.6	12.0																																				
4	12.8	16.0																																				
5	16.0	20.0																																				
6	19.2	24.0																																				
7	22.4	28.0																																				
8	25.6	32.0																																				
9	28.8	36.0																																				
10	32.0	40.0																																				
MM12.0l	411	12.6.5	Merton's Borough Character Study <u>SPD provides more detail of different character areas within the borough and a framework for character-led tall buildings that highlights good practice design approaches. gives holistic guidance on best practice design approach on tall buildings. highlighting the importance of a sites suitability and sensitivity.</u>	See above – Initial MM12.0l at page 408.	September 2022 – in response to actions arising from Stage 1 Hearings																																	
MM12.0l	411	New paragraph below 12.6.7	<u>Tall buildings should be part of a positive strategy for the historic environment and avoid harm to the significance of heritage assets and their settings. In line with the London Plan, proposals resulting in harm will require clear and convincing justification, including what alternatives were explored and what public benefits outweigh the harm.</u>	See above – Initial MM12.0l at page 408.	September 2022 – in response to actions arising from Stage 1 Hearings																																	
MM12.0n	412	Policy D12.7 Advertisements, part a	Express consent will only be granted for advertisements where they do not harm the character of an area , amenity or public safety. When assessing proposals for new advertisements, cumulative impacts will be taken into account.	To ensuring it is consistent with the Advertisement Regulations and NPPF para 136.	September 2022 – in response to Stage 2 MIQs																																	

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM12.0n	412	Policy D12.7 Advertisements, part b. iv.	<u>Advertisements</u> They do not adversely impact on trees <u>that have a significant amenity value</u> on or in close proximity to the proposed site, especially those protected by Tree Protection Orders (TPOs) or within conservation areas.	See above – Initial MM12.0n at page 412.	September 2022 – in response to Stage 2 MIQs
MM12.0n	412	Policy D12.7 Advertisements, part b. v.	<u>Local amenity is not harmed by the restriction of v</u> Visual permeability and natural surveillance between the street and inside non-residential buildings is not compromised by internally applied artwork, blinds or advertising.	See above – Initial MM12.0n at page 412.	September 2022 – in response to Stage 2 MIQs
MM12.0	415	12.8.2	In particularly sensitive areas, notably where heritage assets are affected, locate equipment in underground chambers, <u>or demonstrate a design-led solution that does not harm the setting or significance of the heritage asset.</u>	In response to Stage 2 MIQ's Matter 12 Q21. To improve policies effectiveness.	September 2022 – in response to Stage 2 MIQs
MM12.0o	417	Policy 12.9 Shop front design and signage, part (a)(ii)	Where security shutters are considered necessary, they must be installed on the inside of the shopfront and allow clear views into the shop – solid, near solid shutters and shutters <u>on the outside of a shop front are not usually acceptable will not be permitted and no type of security shutters will be permitted on the outside of a shop front;</u> ...	To ensure the plan is justified	September 2022 – in response to Stage 2 MIQs
MM2.2	417	Policy 12.9 Shop front design and signage, part e	Shop-fronts must be of a high quality and well-proportioned and <u>designed and should be designed in accordance with the council's Shopfront Supplementary Planning Document 2017.</u>	See above - initial MM2.2 at page 42.	March 2022 – response to Inspectors' preliminary matters
MM2.2	418	12.9.1	Shop-fronts have a huge impact on the appearance of individual buildings and parades of shops. <u>Merton's Shopfront SPD provides best practice design approaches for design and should be used when designing shop fronts.</u>	See above - initial MM2.2 at page 42.	March 2022 – response to Inspectors' preliminary matters

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM12.1	423	Policy 12.11 Basements and subterranean design, part j	Basements or subterranean development must be designed to minimise the risk of internal flooding and must not increase the risk of flooding elsewhere. Proposals must include sustainable urban drainage scheme to reduce runoff rates and implement proposals to conserve and re-use water through rainwater harvesting. <u>Where basements discharge to the sewer network, they must install suitable positively pumped devices.</u>	To ensure the Local Plan is justified and effective.	May 2022 – response to Inspectors’ Stage 1 matters INSP03
MM12.2	426	12.10.16	The impact of basement and subterranean development proposals on heritage assets must be assessed on their merits to avoid any harm to their significance or historic integrity. Listed buildings are recognised for their exceptional heritage value and once a listed building is severely damaged or demolished, that historical connection is lost forever. Basements beneath the garden of a listed building are not permitted except on larger sites where the harm to the building’s structure or setting and the basement is substantially separate from the listed building, and Any application for a basement to a designated or non-designated heritage asset should be accompanied by a detailed method statement which demonstrates how the development can be achieved without causing harm to the significance and structural integrity of the asset. Where a level of harm is identified the acceptability of such schemes will be assessed on a case by case basis <u>and in line with National Policy and Guidance.</u>	In response to Stage 2 MIQ’s Matter 12 Q22. To better align with NPPF and to improve clarity.	September 2022 – in response to Stage 2 MIQs
MM12.2	426	12.10.17	The link between the listed building and the basement should be discreet and of an appropriate design and location that does not adversely impact on the significance of the listed building. In the exceptional circumstances w here these are allowed, there should be no extensive modification to the foundations of the listed building or any destabilisation of the listed structure and account will be taken to the individual features of the building and its special interest.	See above - initial MM12.2 at page 426.	September 2022 – in response to Stage 2 MIQs
MM12.2	426	12.10.18	In conservation areas, basements <u>will be supported where they should</u> conserve or enhance the character, and appearance <u>and overall significance</u> of the conservation area. This is particularly relevant in relation to external visible features e.g. light wells and railings which may impact on the character of conservation areas. Further guidance and advice can be found in Merton’s Basement and Subterranean, Design and Sustainable Drainage SPDs. <u>Proposals which impact statutory listed and locally listed buildings will be assessed according to National Policy and Policies 12.5 ‘Managing Heritage Assets’.</u>	See above - initial MM12.2 at page 426.	September 2022 – in response to Stage 2 MIQs
MM2.1	431	Para 13.1.1	The NPPF 2019 and 2021 draft states that planning policies...	See above - initial MM2.1 at	March 2022 – response to

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				Page 35 Plan Ref. 2.1.1	Inspectors' preliminary matters.
MM2.1	443	13.2.16	...in line with the "Agent of Change" approach in the NPPF 2021 2019 and in the London Plan	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors' preliminary matters
MM2.1	443	13.3.2	The NPPF 2021 2019 paragraphs 8, 20 and 81 9 - 91 2, the London Plan	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors' preliminary matters
MM13.0a	449	13.3.7	13.3.7 To demonstrate that full and proper marketing has been undertaken to justify that the employment and community uses are no longer viable, the council requires the applicant to provide Marketing and Vacancy evidence in accordance with the criteria set out in the Appendices, for a minimum of 30 18 months (21 .5 years).	To improve clarity and for effectiveness.	September 2022 - in response to Stage 2 MIQs.
MM13.0	449	13.3.9	13.3.9 In circumstances where proposals for mixed use development are considered, proposals must be designed to ensure <u>optimise the likelihood of successful future</u> occupation and function of employment uses <u>once built, upon completion. In line with the Agent of Change principle set out in the London Plan and the NPPF, the council will not support proposals on scattered employment site where these would curtail the successful operation of non-residential uses.</u> The premises/sites retained for employment uses must:....	To improve clarity and effectiveness	May 2022 – response to the Inspectors questions
MM13.0b	451	Policy EC13.4 (f)	(f) Demonstrate good practice when procuring its own goods and services by following the Public Services (Social Value) Act through Merton's Social Value Toolkit	Not sufficiently related to the development and use of land in the area (per S17(3) of the 2004 Act)	September 2022 – in response to Stage 2 MIQs
MM13.0b	453	13.4.12	13.4.12 Our Social Value Toolkit has been designed to help council officers along with providers of council goods and services to understand what Social Value is in order to comply with legislation and be able to practically consider and achieve Social Value from commissioning and procurement activities. In doing so, we can help achieve positive outcomes and value for the Borough through the contracts	See above - initial MM13.0b at Page 451	September 2022 – in response to Stage 2 MIQs

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM13.1	454	Policy TC 13.5	<p>we procure.</p> <p>All frontages in Merton's town centres and neighbourhood parades. A. Supporting proposals for developments where: ... Within Wimbledon, Colliers Wood, Mitcham and Morden town centres aB. In addition to (a)A., supporting proposals for developments that: ... iii. Betting shops (use identified as sui generis), are not compatible with the main retail or social function of the town centres and are not considered appropriate new uses within the primary shopping area.</p> <p>Within Local town centres aC. Supporting proposals: ... iii. that do not provide betting shops within the primary shopping area.</p>	To improve clarity and effectiveness	May 2022 – response to the Inspectors questions
MM13.1i	455	Policy TC13.5 and 13.5.22	<p>Ci The council will resist major increases (above 1,000sqm) in town centre type use floorspace in local centres unless it contributes to the council's Good Growth regeneration objectives.</p> <p>13.5.22 Development that provides a major increase (over 1,000 sqm) of town centre type uses will not be supported in the local centres of Arthur Road, Motspur Park, North Mitcham, Raynes Park South Wimbledon and Wimbledon Village unless it contributes to the council's Good Growth regeneration objectives.</p>	To make the policy effective	wi3September 2022 – Actions arising from the Stage 1 hearings
MM13.1a	455	Policy TC.13.5	<p>Within Neighbourhood parades AD. Maintaining neighbourhood parades to provide convenience shopping and other services within walking distance of local residents. Large increases in commercial floorspace in neighbourhood parades will be resisted</p>	To improve clarity.	May 2022 – response to the Inspectors questions.
MM2.1	456	13.5.2	The NPPF 2019 (and 2021 consultation draft) makes clear that local authorities should definte define the extent of the Primary Shipping Area and the town centre boundary. These are available on Merton's Policies Map for each town centre.	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors' preliminary matters
MM2.1	456	13.5.4	The NPPF 2021 2019 and associated NPPG promotes	See above - initial MM2.1 at	March 2022 – response to

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				Page 35 Plan Ref. 2.1.1	Inspectors' preliminary matters
MM13.2	457	13.5.8	Betting shops and hot food takeaways (use identified as sui generis), are not compatible with the main retail or social function of the town centres and thus are not considered appropriate new uses outside of <u>within</u> the primary shopping area <u>of Merton's town centres</u> .	To improve clarity and effectiveness	May 2022 – response to the Inspectors questions
MM13.1a	461	13.5.31	Neighbourhood parades are identified to ensure that local shopping facilities are retained within walking distance of residents to meet their day-to-day needs. <u>As set out in the Table 13.5 "Merton's town centres", neighbourhood parades are not designated town centres and as such, large increases in commercial floorspace will be resisted in line with policy Tc13.6</u>	To improve clarity	May 2022 – response to the Inspectors questions
MM13.3	464	Policy TC 13.6, 2nd paragraph	<p>A. The scope of the sequential test (required over 280sqm net new floorspace) and impact assessment (<u>required over 280sqm net new floorspace</u>) submitted is proportionate to the scale of the development proposed and satisfies the council's requirements.</p> <p>B. Local convenience development outside town centres meets all of the following criteria: ...</p> <p>C. Vitality and viability of Merton's existing town centres would not be harmed. Planning conditions may be imposed on applications, to ensure that proposals do not have an adverse impact on the vitality and viability of existing town centres. Such conditions may: ...</p>	<p>Positively prepared and consistent with national policy.</p> <p>Reference numbers added for clarity.</p>	May 2022 – response to the Inspectors questions
MM2.1	465	13.6.1	... the NPPF 2021-2019 (paras 86 0-91 0)...	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors' preliminary matters
MM2.1	465	13.6.2	The NPPF 2021 2019 and the London Plan support the "town centres first" approach...	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors' preliminary matters
MM2.1	465	13.6.4	As set out in the NPPF 2019 (and the 2021 draft) the Primary Shopping Area...	See above - initial MM2.1 at	March 2022 – response to

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				Page 35 Plan Ref. 2.1.1	Inspectors' preliminary matters
MM13.4	465	13.6.5 (first sentence)	Impact assessments may be required for any retail proposals located edge-of-centre or out-of-centre where the net floor area <u>of the new proposal</u> exceeds 280sqm.	Clarity and justification	May 2022 – response to Inspectors matters, issues and questions.
MM2.1	465	13.6.5 (second sentence)	In accordance with the National Planning Policy Framework 2019 (<u>NPPF 2021 paragraph 90</u>), impact assessments will be required for leisure and office development above 2,500 sqm <u>gross</u> (MM13.5) located outside town centres and not in accordance with the development plan.	NPPF: See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	NPPF: March 2022 – response to Inspectors' preliminary matters.
MM13.5	465	13.6.5 (second sentence)	In accordance with the National Planning Policy Framework 2019 (<u>NPPF 2021 paragraph 90</u> (MM2.1)), impact assessments will be required for leisure and office development above 2,500 sqm <u>gross</u> located outside town centres and not in accordance with the development plan.	For consistency with national policy	May 2022 – response to Inspectors matters, issues and questions.
MM2.1	471	13.8.1	The NPPF 2021 2019 , the London Plan and Merton's strategic policies...	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	March 2022 – response to Inspectors' preliminary matters
MM13.6	477	TC13.9, part e	Supporting proposals for the change of use from culture, arts and tourist accommodation to alternative uses only if it can be demonstrated to the council's satisfaction that full and proper marketing of the site at reasonable prices for a period of 30-18 months (<u>21.5</u> years) confirms the financial non- viability for these purposes, unless suitable replacement site for the culture and arts use which is of better standard and quality is provided locally; or, ii. Where it can be demonstrated that the existing tourist accommodation is no longer viable and does not provide facilities for the local community.	To improve clarity and for effectiveness.	September 2022 - in response to Stage MIQs.
MM14.1	484	14.1.15 - 14.1.18	Water and Wastewater <u>Infrastructure</u> 14.1.14 To accommodate the expected population and housing growth across the borough, the council is supportive of improvements and upgrades to water supply and wastewater services, to contribute to security of supply.	Changes made to the supporting text to avoid duplication with the Flooding	November 2021 – for submission

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			<p>14.1.15 We <u>The council</u> will work with the water and wastewater providers <u>companies to seek to ensure that there is adequate water supply, surface water, foul drainage, and wastewater infrastructure and sewerage treatment capacity to serve all new developments. Developers will also need to agree details with water and wastewater companies for adequate water supply, surface water, foul drainage and sewerage treatment capacity.</u></p> <p><i>(new paragraph break)</i> Developers will be required to demonstrate <u>as part of the planning application process</u> that there is adequate capacity both on and off-site to serve the development and that the development would not lead to problems for existing users. In some circumstances this <u>may make it necessary for developers to will necessitate that developers</u> carry out appropriate studies to ascertain the effect proposed development will have on the existing infrastructure. Overloading of the system will not be permitted.</p> <p><i>(new paragraph break)</i> Where there is a capacity problem the developer will be required to fund appropriate improvements to be completed prior to completion of the development. An exception to this may be where the water company has improvement works programmed in that align with the completion time of the development. <u>The council will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.</u></p> <p>14.1.16 Thames Water and SES Water will work with developers and the council to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development.</p> <p>14.1.17 Developers are encouraged to contact the water and wastewater companies as early as possible to discuss their development proposals and intended delivery programme to assist operators with identifying any potential water and wastewater network reinforcement requirements.</p> <p>14.1.18 Where appropriate, planning permission for development which results in the need for off-site infrastructure upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades. Where there is a capacity constraint, phasing conditions will be used</p>	<p>policies, to support the new policy IN14.1(h) and to ensure the wording is up to date, accurate and clear.</p> <p>Changes made following Thames Water's Stage 3 submission and a subsequent meeting held with Thames Water and officers. (Previously AM14.4)</p>	<p>September 2022 – in response to Stage 2 MIQs.</p>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			<p>as appropriate to ensure that any necessary infrastructure upgrades can be delivered ahead of the occupation of the relevant phase of a development.</p> <p>14.1.19 We are supportive of improvements to water supply or wastewater facilities, to ensure adequate long term water supply and wastewater management throughout the borough.</p>		
MM3.2a	485	14.1.24	<p>Southern Gas Networks SGN owns and operates the local gas distribution network in Merton.</p>	See above - initial MM3.2a at Page 96	September 2022 – in response to Stage 2 MIQs.
MM13.6	486	Policy 13.9e	Supporting proposals for the change of use from culture, arts and tourist accommodation to alternative uses only if it can be demonstrated to the council's satisfaction that full and proper marketing of the site at reasonable prices for a period of 30-18 months (21.5 years) confirms the financial non- viability for these purposes, unless	To make the plan effective.	September 2022 – in response to Stage 2 MIQs
MM14.2	488	Policy IN14.2(e)(i) and 14.2.40	<p>i. It provides for an identified need</p> <p>14.2.40 We will support the development of new social and community infrastructure uses where there are identified gaps in provision <u>it addresses a local o strategic need, in line with London Plan Policy S1(C).</u></p>	For conformity with the London Plan.	September 2022 – in response to Stage 2 MIQs.
MM2.1	490	14.2.5	Sports and leisure facilities (including Playing Pitches), should be tested against paragraph 97 99 of the NPPF and considered against the requirements of London Plan Policy S5. ...	See above - initial MM2.1 at Page 35 Plan Ref. 2.1.1	<p>First published in Document 0D4b Additional modifications in November 2021 for submission</p> <p>March 2022 – response to Inspectors' preliminary matters</p>
MM4.1	502	14.3.30	In 2018, the London boroughs of Croydon, Kingston, Merton and Sutton started working on the next version of the South London Waste Plan, making the most of their strong track record and commitment to joint working and helping to deliver the new London Plan's policies and de-risk the delivery of essential infrastructure for south London. The new South London Waste Plan will address waste	See above - initial MM4.1, page 119.	March 2022

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM15.0	505	New paragraphs below 15.1.2	<p>management needs during the 15-year period from 2021 till 2036 <u>2022 till 3027</u>.</p> <p><u>There are 9 areas of Metropolitan Open Land (MOL) designated in Merton, which are of great importance to the green character of the borough. Through the green infrastructure reviews undertaken for this Plan, the MOL boundaries have been reviewed and the council does not consider that major changes are needed to accommodate growth. The MOL sites illustrated on the Policies Maps and listed in the Appendices will continue to be protected from inappropriate development in accordance with London Plan Policy G3 and NPPF paragraph 147. Further information is set out in Policy O15.2 Green Infrastructure and Open Space.</u></p> <p><u>Some minor boundary amendments have been made to MOL sites on the Policies Map through this Local Plan. These include corrections to mapping irregularities, and inconsistencies, changes to reflect the built form on site that has come forward through approved planning applications, which no longer protects the spatial or visual openness of the MOL, and some exceptional circumstances. These boundary changes to the Policies Map help to create strong, defensible and permanent boundaries and ensures consistency with the NPPF and London Plan. With reference to NPPF 140, further information on these boundary changes is provided in the Appendices.</u></p>	For consistency with national policy.	<p>May 2022 – response to Inspectors’ matters issues and questions.</p> <p>September 2022 - in response to Stage 1 hearing actions.</p>
MM15.1	511	Policy O15.3 (d)	<p>Require development to contribute to net gains in <u>B</u>biodiversity by incorporating features such as green roofs and walls, soft landscaping, bird and bat bricks and boxes, habitat restoration, tree planting and expansion and improved green links. <u>Where development is adjacent to or includes a watercourse, natural banks and processes should be restored with a 10m buffer.</u></p>	For the policy to be justified and effective. Agreed with the Environment Agency in Statement of Common Ground. Initially added as AM15.6.	<p>November 2021 – submission (added as AM15.6).</p> <p>Further modifications made September 2022 – in response to Stage 2 MIQs.</p>
MM15.1a	515	New paragraph below 15.3.21	<p><u>The Environment Act 2021 introduces mandatory net biodiversity gain for all development from November 2023. Applicants should refer to Natural England guidance, British Standard BS8683:2021: Process for designing and implementing Biodiversity Net Gain and the latest version of the DEFRA biodiversity metric.</u></p>	For clarity and effectiveness, to highlight guidance for biodiversity net gain.	September 2022 - in response to Stage 2 MIQs.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				This paragraph has been added following a recommendation from the Environment Agency. <i>(supersedes former AM15.8)</i>	
MM15.1b	517	Policy O15.4, part e and 15.4.5	<p>e. Only permit development if it will not damage <u>a protected tree or a tree of significant amenity value.</u> or destroy any tree which:</p> <p>i. is protected by a Tree Preservation Order;</p> <p>ii. is within a conservation area; or,</p> <p>iii. has significant amenity value.</p> <p><u>f. Only support development that involves the removal of a tree when:</u> However, development may be permitted when:</p> <p>i. iv. The removal of the tree is necessary in the interest of good arboricultural practice; or</p> <p>ii. v. The benefits of the development outweigh the tree's amenity value.</p> <p><u>g.</u> In circumstances where f) i. or ii. e) iv. or v. applies, suitable high-quality re-provision of equal value must be provided on site. Where on site provision is demonstrably not possible, as agreed with the council, a financial contribution of the full cost of appropriate re-provision will be required.</p> <p>15.4.5 We will use the existing planning mechanisms including Tree Preservation Orders and Conservation Area designations to protect existing trees on private land. <u>Applicants should refer to the laws and guidance on Tree Preservation Orders, including Part VIII of the Town and Country Planning Act 1990, the Town and Country Planning (Tree Preservation)(England) Regulations 2012 and government guidance on Tree Preservation Orders and trees in conservation areas. These links provide the necessary information and requirements on trees that have Tree Preservation Orders and trees within conservation areas.</u></p>	For clarity, to ensure the plan is justified and ensure the policy is consistent with government guidance on TPOs.	September 2022 - in response to Stage 2 MIQs.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM15.1c	521	Policy O15.5, part c	Strongly encourage <u>support</u> the inclusion of <u>U</u> urban <u>G</u> reening for all other development in Merton.	For clarity and to ensure the plan is justified.	September 2022 – in response to Stage 2 MIQs.
MM15.1d	524	Policy O15.6, part d and 15.6.10	<p>d. Support the <u>protection and</u> completion of the Wandle Trail, <u>as shown on the 'Wandle Trail / National Cycle Network Route 20 (NCN20)' Policies Map and the Indicative Cycle Network' Policies Map.</u></p> <p>15.6.10 While most sections are in a good condition, there are some <u>sections missing links and areas</u> that will require future investment and improvement to enable a continuous trail that is fully accessible to all users, at all times of the year. We support the <u>protection and</u> completion of the Wandle Trail, including the identified improvements in access required in the north east of the borough, near Earlsfield (<u>refer to Policy Maps 'Wandle Trail / National Cycle Network Route 20 (NCN20)' and 'Indicative Cycling Network' and Table 16.1). This includes the currently inaccessible section from Trewint Street to Ravensbury Terrace.</u> This will complete a missing link, and provide a safer, quieter and more pleasant alternative route for cyclists and pedestrians to the busy Durnsford Road bridge. <u>Completion of the Wandle Trail missing link will involve joint work between the boroughs of Merton and Wandsworth, the Environment Agency and National Rail, supported through Section 106 contributions already secured, other funding sources and the provision of access routes already secured through adjacent development sites. Any improvements here would need to be agreed with the neighbouring borough of Wandsworth.</u> Investment in the Wandle Trail should respect the character of the river's environs and be designed for pedestrian and cycle access.</p>	For clarity and effectiveness in linking the policy with the relevant Policy Maps, to clearly identify and illustrate the location of the Wandle Trail missing link.	September 2022 – in response to Stage 2 MIQs.
MM15.1e	529	Policy F15.7 part e	<u>Work Deliver wastewater infrastructure improvements across the borough in partnership in collaboratively partnership</u> with water companies to help <u>them</u> develop and implement their Drainage and Wastewater Management Plans (DWMPs) <u>to enable them to deliver water and wastewater infrastructure improvements across the borough.</u>	In response to action arising from Stage 1 Hearings of Merton's Local Plan to ensure consistency and clarity, and to set out effective working with water and	September 2022 – actions from Stage 1 hearings.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM15.1f	539	15.8.14 and 15.8.15	<p>Water infrastructure</p> <p>15.8.14— We will look to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will need to show that there is adequate capacity both on and off-site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out studies to learn the effect proposed development will have on the existing infrastructure. Overloading of the system will not be allowed.</p> <p>15.8.15— Where there is a capacity problem the developer will need to fund improvements to be completed prior to completion of the development. An exception to this is where the water company has improvement works programmed in that fits with the completion time of the development.</p>	<p>wastewater companies.</p> <p>Following comments from Thames Water, these paragraphs have been deleted and the appropriate wording is now within the Infrastructure Policy as MM14.1 (Previously AM15.16)</p>	<p>November 2021 – for submission</p> <p>September 2022 – actions from Stage 1 hearings.</p>
MM15.1g	539	15.8.16	<p>Basement and subterranean applications must ensure they are safe from flooding and do not increase risk to and from the site. We will only allow basements and other underground/subterranean development where:</p> <ul style="list-style-type: none"> • It it can be proven it will not cause harm to the built and natural environment and local amenity including the local water environment, ground conditions and biodiversity. • <u>The basement does not result in an increased risk of flooding (from all sources including surface water flooding)</u> • The basement itself will be, protected from flooding. • Positively pumped devices are, installed to protect basements from the risk of sewer flooding. <u>Applicants are required to show the location of the pump device on the planning application drawings.</u> 	<p>In response to action arising from Stage 1 Hearings of Merton’s Local Plan to ensure consistency with the Design policy. (Previously AM15.17)</p>	<p>September 2022 - actions from Stage 1 hearings</p>
MM15.1h	539	15.8.17	<p><u>As required by policy D12.11, b</u>Basement developments require the submission of more information in the form of a Basement Impact Assessment (BIA) <u>including site specific ground investigation, Drainage Strategy, an outline Construction Method Statement (CMS) and a Construction Traffic Management Plan and Site-Specific Ground Investigation</u> to provide us with a basis for deciding planning applications. <u>Merton’s Basement and Subterranean Development SPD</u> provides guidance and sets out what needs to be demonstrated as part of an assessment.</p>	<p>In response to action arising from Stage 1 Hearings of Merton’s Local Plan to ensure consistency with the Design policy</p>	<p>September 2022 – actions from Stage 1 hearings</p>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM15.1i	541	Policy F15.9 Sustainable Drainage Systems, 1 st paragraph	All major development must include water efficiency measures, to minimise water consumption such as rainwater harvesting or grey water recycling. In addition, all major development must include, as well as Sustainable Drainage Systems (SUDS) to reduce surface water runoff to greenfield rates, and provide multifunctional benefits, biodiversity, urban greening, amenity and water quality benefits.	To provide clarity and ensure that the policy is justified and consistent with National Policy	September 2022 – in response to Stage 2 MIQs.
MM15.1i	541	Policy F15.9 Sustainable Drainage Systems, part a	Seeking mitigating measures against the impact of flooding from all sources and ensure all new development, including all basement and subterranean development implement appropriate SUDS. and show sustainable approaches to the management of surface water in line with the Non-Statutory Technical Standards for SUDS.	See above – initial MM15.1i at page 541.	September 2022 – in response to Stage 2 MIQs.
MM15.1i	541	Policy F15.9 Sustainable Drainage Systems, part b	Ensuring developers demonstrate prove the maintenance and long-term management of the site's drainage scheme in perpetuity SUDS through a SUDS Maintenance and Management Plan submitted as part of the planning process.	See above – initial MM15.1i at page 541.	September 2022 – in response to Stage 2 MIQs.
MM15.1i	541	Policy F15.9 Sustainable Drainage Systems, part d	Requiring the retention of soft landscaping and green spaces permeable surfaces in existing gardens where possible. For example, all new driveways or parking areas associated with development should be made of permeable materials in line with permitted development rights.	See above – initial MM15.1i at page 541.	September 2022 – in response to Stage 2 MIQs.
MM2.2	544	Policy P15.10 Improving Air Quality and Minimising Pollution, part b	Several policies in the local plan contribute to reducing and/or mitigating the impacts of air pollution such as transport, green infrastructure, design and climate change policies. Developers must have regard to follow any guidance provided by Merton Council on local environmental impacts and pollution as well as on noise generating and noise sensitive development. Where necessary, we will set planning conditions to reduce and mitigate pollutant impacts	See above - initial MM2.2 at page 42.	March 2022 – response to Inspectors' preliminary matters
MM15.1j	544	Policy P15.10 Improving Air Quality and Minimising Pollution, part b Where necessary, we will set planning conditions to reduce and mitigate pollutant impacts. <u>Appropriate site investigations and reports on pollution, contamination, and land stability, prepared by a competent and accredited professional, must be made available and submitted to the Local Planning Authority to inform the assessments set out in this policy.</u>	To ensure that sites are suitable for proposed uses taking account of ground conditions and any risks arising	September 2022 – in response to Stage 2 MIQs.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				from land stability or contamination in accordance with national policy and guidance.	
MM15.1k	544	Policy P15.10 Improving Air Quality and Minimising Pollution, parts cc and dd to move to below part b	<p>cc. <u>The design and layout of new development must endeavour to minimise conflict between different land uses, taking account of users and occupiers of new and existing developments. Any noise and polluting activities or feature such a plant equipment should be located away from sensitive areas, where possible to ensure that there are no detrimental impacts on living conditions, health and wellbeing or local amenity.</u></p> <p>dd. <u>Where there are, already significant adverse effects on the environment or amenity due to pollution, sensitive uses should be steered away from such areas. However, given the limited availability of land for development in the borough, this will not always be possible. Therefore, new developments, including changes of use, should mitigate and reduce any adverse impacts resulting from air and light pollution, noise, vibration and dust to acceptable levels.</u></p>	Moved to improve the clarity and effectiveness of the plan.	September 2022 – in response to Stage 2 MIQs.
MM15.2	544	Policy P15.10 Improving Air Quality and Minimising Pollution, part e and g	<p>e. <u>Development proposals in Air Quality Focus Areas (AQFAs) or development proposal that are likely to be, used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to, minimise exposure following London Plan policy SI 1: Improving air quality.</u></p> <p>...</p> <p>g. Development proposals must consider the impact <u>of air quality</u>. <u>An AQA will be required for proposals introducing new developments in areas already subject to poor air, major developments, developments involving biomass boilers, biomass or gas CHP (including connections to existing networks where the increased capacity is not already covered in an existing AQA), substantial earthworks or demolition and any development that could have a significant impact on air quality, either directly or indirectly. The following will be needed:</u></p>	Following Stage 1 Hearings in June 2022 – the council is proposing combining the MM as outlined in the hearing statement (April 2022).	May 2022 – Matters and Issues Question (MIQs) from the Planning Inspector September 2022 – in response to actions arising from Stage 1 Hearings

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			<p>i. ...</p> <p>iv. Strict Mitigation for developments to be used by sensitive receptors such as schools, hospitals, care homes, areas of deprivation and in areas of existing poor air quality; this, also applies to proposals close to developments used by sensitive receptors.</p> <p>v. ...</p>		
MM15.3	545	Policy P15.10 Improving Air Quality and Minimising Pollution, part j	We will seek financial contributions using Planning Obligations towards air quality measures where a proposed development is not air quality neutral, or mitigation measures do not reduce the impact upon poor air quality. <u>In determining the contribution, the Council will refer to the London Plan Air Quality Neutral guidance (section 5).</u>	Following review of the policy in light of MIQs – the council propose making the MM on the ground of Soundness and clarity.	May 2022 – Matters and Issues Question (MIQs) from the Planning Inspector
MM2.2	546	Policy P15.10 Improving Air Quality and Minimising Pollution, part r	Development proposals for leisure, sport and/or play facilities must <u>have regard to follow</u> Sport England’s Artificial Lighting Guidance and London Plan policy S5 Sports and recreation facilities.	See above - initial MM2.2 at page 42.	March 2022 – response to Inspectors’ preliminary matters
MM15.1j	547	Policy P15.10 Improving Air Quality and Minimising Pollution, part t	<u>Ground conditions, Land contamination and instability</u> Where development is proposed on or near a site known to be, or there is good reason to believe may be, contaminated, <u>or have unstable ground</u> , or where a sensitive use is proposed, the applicant must carry out a site assessment and submit a report of the findings to establish the nature and extent of the contamination <u>and/or land instability</u> . Development will not be, permitted unless practicable and effective measures are to be (AM15.21) taken to treat, contain or control any contamination <u>or land stability issues</u> .	See above - initial MM15.1j at page 544.	September 2022 – in response to Stage 2 MIQs.
MM15.1j	547	Policy P15.10 Improving Air Quality and Minimising	Developments must incorporate proper remediation measures for development on or near a site, which is potentially contaminated <u>or has land instability issues</u> .	See above - initial MM15.1j at page 544.	September 2022 – in response to Stage 2 MIQs.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
		Pollution, part u			
MM15.1j	547	Policy P15.10 Improving Air Quality and Minimising Pollution, part v	Development will not be allowed unless practical and effective measures are taken to treat, contain or control any contamination <u>or land instability issues</u> , so as not to: <ul style="list-style-type: none"> i. ... v. <u>Cause or increase land instability issues on adjoining land or buildings.</u> 	See above - initial MM15.1j at page 544.	September 2022 – in response to Stage 2 MIQs.
MM2.2	548	Policy P15.10 Improving Air Quality and Minimising Pollution, part bb, i	Its essential construction and demolition sites <u>have regard to follow</u> the Right Waste Right Place guidance and Waste Management Duty of care of practice to ensure construction and demolition waste is, managed correctly to prevent pollution and miss description of waste.	See above - initial MM2.2 at page 42.	March 2022 – response to Inspectors' preliminary matters
MM15.4	549	New paragraph before 15.10.1	<u>The Council will apply London Plan policy SI1 Improving air quality to all development proposals in the borough, along with associated Mayoral guidance on Air Quality Neutral and Air Quality Positive standards and on ways to reduce construction and demolition impacts.</u>	Following review of the policy in light of MIQs – the council propose making the MM on the ground of Soundness.	May 2022 – Matters and Issues Question (MIQs) from the Planning Inspector
MM15.7	549	New paragraphs below 15.10.2	<u>The whole of Merton is designated an Air Quality Management Area (AQMA) and has three Air Quality Focus Zones in the borough. The main sources of particulate matter are road transport (50.4%), re- suspended dust from roads and surfaces (19.9%) and static non-road mobile machinery (10.3%). In respect of the transport sources apportionment data for the borough shows that diesel vehicles contribute approximately 90% of the NOx emissions and 80% of the PM10 emissions (based on 2013 modelled data).</u> <u>Merton's air quality priorities are to continue to encourage sustainable travel and sustainable construction; to reduce exposure to air quality and raise awareness; and to work in partnership with residents, community and business groups.</u>	Following review of the policy in light of MIQs – the council propose making the MM on the ground of Soundness.	May 2022 – Matters and Issues Question (MIQs) from the Planning Inspector

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			<u>Transport for London and other organisations to concentrate on local pollution problems in Merton.</u>		
MM15.8	549	15.10.3 and 15.10.4	<p>The local plan can influence air quality in several ways, for example through what development is proposed and where, and the provision made for sustainable transport. Consideration of air quality issues at the plan-making stage can ensure a strategic approach to air quality and help secure net improvements in overall air quality where possible. The whole borough has been declared an Air Quality Management Area (AQMA) for last two decades.</p> <p>We seek to tackle poor air quality in an integrated way, the Local Plan together with a wider range of measures set out in Merton's Air Quality Action Plan, which supports the Government's Clean Air Strategy (2019), the Mayor of London Environment Strategy (2018) and other legislation.</p>	Following review of the policy in light of MIQs – the council propose making the MM on the ground of Soundness.	May 2022 – Matters and Issues Question (MIQs) from the Planning Inspector
MM15.5	550	New paragraph before 15.10.5	<u>The aim of an AQA is to find any significant impact on local air quality and/or disamenity due to dust and/or odour and/ or whether new development will introduce new exposure in an area of poor air quality. The contents of the AQA will depend on the nature of the proposed development.</u>	Following review of the policy in light of MIQs – the council propose making the MM on the ground of Soundness.	May 2022 – Matters and Issues Question (MIQs) from the Planning Inspector
MM15.9	550	New paragraph below 15.10.7	<u>Consideration must be given to the impact of improvements on air quality elsewhere. For instance, traffic reductions could improve local air quality but push traffic-related air quality impacts to other areas. Early engagement with us is encouraged to assess how the development could avoid these unintended consequences. The supporting emerging Air Quality Supplementary Planning Document (SPD) provides further details on for AQA and what; we expect to be, proved within an AQA. The assessment should provide decision makers with sufficient information to understand the scale and geographic scope of any detrimental, or benefit impacts on air quality and enable them to exercise their professional judgement in deciding whether the impacts are acceptable, in line with best practice.</u>	Following review of the policy in light of MIQs – the council propose making the MM on the ground of Soundness.	May 2022 – Matters and Issues Question (MIQs) from the Planning Inspector
MM15.10	550	15.10.9	<p>Air Quality Neutral and Positive</p> <p>We have adopted the London Plan's approach to Air Quality Positive and Neutral development. Large master planning and large-scale developments have the potential to include methods to improve local air quality. All other major developments should not make air quality worse and are encouraged to achieve</p>	Following review of the policy in light of MIQs – the council propose making	May 2022 – Matters and Issues Question (MIQs) from the

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			an overall improvement to air quality. The Air Quality Neutral requirement also applies to developments incorporating Solid Biomass Boilers and CHP (Combined Heat and Power) due to the potential impact of these technologies on air quality. When all measures to achieve Air Quality Neutral status have been, exploited, financial contributions to offset the impact of the development on air quality may be, considered as a final intervention. <u>The process and calculation for this are set out in Section 5.2 of the GLA's Air Quality Neutral Planning Support Document (AQNPSD).</u>	the MM on the ground of Soundness.	Planning Inspector
MM16.0	559	Strategic Policy T16.1 Sustainable Travel, part e.	Seek to manage vehicle use and parking to improve road safety outcomes and , reduce <u>traffic dominance and minimise</u> impact on the transport network.	Following review of the policy in light of MIQs – the council propose changing the status of this change from an AM to a MM as it is considered necessary on the grounds Soundness.	Originally proposed as an AM16.1 in Nov 2021 and March 2022. MM introduced in Sept 2022 in response to Matters and Issues Question (MIQs) from the Planning Inspector
MM16.1	560	16.1.2	As set out in the Mayor's Transport Strategy and the Government's Decarbonising Transport Strategy, the only realistic way to address some of the transport challenges problems is to reduce <u>set out the overarching policy framework and strategic approach to transport which focuses on reducing</u> dependency on cars in favour of active, efficient and sustainable modes of travel.	Additional reference to newly published Decarbonising Strategy and associated wording amendment.	May 2022
MM16.2	563	Policy T16.2 Prioritising active travel choices, part d	Provide secure, covered cycle parking <u>facilities that meet or exceed in accordance with</u> London Plan minimum standards (higher level <u>requirements</u>) and <u>are designed to a high standard with regard to Chapter 8 of the</u> London Cycle Design Standards. Facilities should include provision for charging of electric cycles and a minimum of 5% of cycle spaces should accommodate users of non-standard cycles.	November 21 Amendment made as proposed by TfL Spatial Planning and to ensure consistency with London Plan	November 2021 Amendment made as proposed by TfL Spatial Planning and to ensure

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				policy T5 A 2 which states that “Developments should provide cycle parking at least in accordance with the minimum standards.	consistency with London Plan policy T5 A2 March 2022/ Sept 2022. Further amendment made in response to Inspectors preliminary matters and MIQs.
MM16.2a	563	Policy T16.2 Prioritising active travel choices, part f	Make provision for or a contribution towards publicly accessible cycle parking and dockless cycle and scooter hire schemes where required.	Amendment made to remove the word “dockless” as the policy could also be applied to docked cycle and scooter hire schemes.	September 2022
MM16.2b	564	17.2.3	The Mayor’s Transport Strategy sets a target for all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day by 2041. However, only around a third of Merton residents do 20 minutes of active travel a day and worryingly, there has been a slight decline over the last five years. <u>The Government’s decarbonising transport strategy sets out the aim that half of all journeys in towns and cities will be cycled or walked by 2030.</u> Approximately 30% of <u>Merton</u> residents’ daily trips are already conducted by walking but less than 2% by bicycle. <u>TfL research indicates that a significant number of existing short car journeys in Merton could potentially be made by walking or cycling. Merton is a relatively small borough with a network of pedestrian and cycle routes which make many locations easily accessible by walking or cycling. There is significant opportunity for more cycle and walking journeys, particularly for shorter trips.</u>	Supporting text amended and updated to provide clarity in response to comments from Merton Cycling Campaign and to include targets set out in the Government’s <u>decarbonising</u>	November 2021 – for submission Moved from AM16.6 to MM in September 22 as the mod is necessary for soundness to ensure consistency with national policy.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM16.2c	564	New paragraph created using some wording from 17.2.4 and some additional wording.	<p>...There are pleasant, traffic free walking and cycling routes though the Borough's parks and open spaces that enable active travel choices by connecting key destinations via convenient shortcuts. In particular the Wandle Trail provides a major active travel route across the borough that connects neighbourhoods including Morden and Colliers Wood.</p> <p><u>It is, however, recognised that cycle and pedestrian provision in Merton is not of adequate standard in all areas and that significant barriers still exist to cycle and pedestrian journeys, particularly through the severance created by busy roads.</u></p> <p>We will work with Transport for London, developers and other partners to make further improvements over the plan period with the <u>aim of providing comprehensive cycling and walking networks that enable active travel choices to be made.</u> <u>In order to contribute to the aim set out in the Government's decarbonising transport strategy, to deliver a world class cycling and walking network in England by 2040, Merton will produce cycling and walking strategies in 2023 which will set out more detailed proposals for cycle and pedestrian route development over the plan period.</u></p>	<p><u>transport strategy.</u></p> <p>Wording from 17.2.4 moved and additional wording added to create new paragraph, which provides more clarity around the requirement for improvements to cycling and walking networks, in response to comments from Merton Cycling Campaign and to reference national policy.</p>	<p>November 2021 (previously AM16.8). Moved to Main Modification and further amendments made in September 2022</p>
MM16.2d	565	17.2.5	<p>Development proposals <u>should must demonstrate through their Transport Assessment or Statement that sites are accessible by walking and cycling in accordance with TfL's Healthy Streets Approach. An Active Travel Zone (ATZ) assessment should be conducted in accordance with TfL guidance which assesses and identifies maximise opportunities to integrate with and improve cycling and walking networks through. ATZ assessments should particularly consider opportunities to improve cycle routes identified on the indicative cycle network map which shows cycling desire lines and potential routes that could form part of a future comprehensive cycle network to be delivered by the end of the plan period. Some sections of the network already have existing high quality cycle facilities in place and routes on the quieter roads will require minimal intervention. However, some routes will require significant intervention or further improvement to achieve the standard required.-Developers should refer to Merton's and TfL's latest cycle route network maps and transport/ cycling strategies for further information on existing and planned routes and seek to</u></p>	<p>Paragraph 17.5.16, under policy T16.5 moved and integrated with paragraph 17.2.5 to provide more clarity around what is shown on the indicative cycle network policy map, in response to comments from Merton Cycling</p>	<p>November 2021 in response to comments made at Reg 19 stage by Merton Cycling Campaign and Merton Residents Transport Group (previously AM 16.9). Moved to Main Modification</p>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			<u>consult at an early stage to discuss any requirements in relation to the cycle or pedestrian networks.</u>	Campaign and TfL Spatial Planning and requirements for cycling infrastructure in response to inspectors MIQs	and further amendments made in September 2022 in response to Inspectors MIQs
MM16.2e	565	17.2.6	<p><u>Developments may be required to make financial contributions to cycling or walking schemes and/ or providing new routes across development sites. Any existing cycle or walking routes on or adjacent to development sites must be fully protected, including during construction phase, and opportunities should be sought to improve and upgrade routes as part of the development proposals.</u></p> <p>Development layouts should <u>must</u> be designed to give priority to pedestrian and cycle movements, and should facilitate access to public transport networks <u>and be designed in accordance with the Healthy Streets approach. New development should, where appropriate, seek to restrict traffic dominance by adopting the principles of low traffic neighbourhoods and filtered permeability into the site layouts and should integrate with and contribute towards any new or existing low traffic schemes on the surrounding street network.</u> Proposals for gated developments that prevent public access through development sites by cyclists and pedestrians, will be resisted. <u>New and improved street layouts including P</u> pedestrian and cycle-infrastructure should <u>must</u> be provided to a high standard in accordance with the latest best practice design guidance <u>and requirements including</u>; DfT <u>Cycle infrastructure design LTN 1/20, Manual for Streets</u> and <u>TfL Streets Toolkit, Streetscape Guidance, London Cycling Design Standards, TfL Healthy Streets Approach and Healthy streets check for designers.</u></p>	Paragraph amended to combine some wording from paraps 17.2.5 and 17.2.9 and additional wording to provide more clarity around requirements for development in relation to the cycle and pedestrian design and networks. In response to comments made at Reg 19 stage by Merton Cycling Campaign and Merton Residents Transport Group and in response to Inspectors MIQs	November 2021 in response to comments made at Reg 19 stage by Merton Cycling Campaign and Merton Residents Transport Group (previously AM 16.10). Moved to Main Modification and further amendments made in September 2022 in response to Inspectors MIQs

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM16.2a	566	17.2.12	Mobility hire services are becoming more mainstream and include dockless electric-bikes and electric-scooters. These innovative services have the potential to provide a cost-effective, sustainable and convenient way of getting around as an alternative to car and public transport use. We support these services where they are appropriately licenced and accredited through nationally recognised organisations, ensure safety for users and other road users and do not undermine take up of active travel. To accommodate these services, we will seek to provide designated dockless parking locations and may require appropriate developments to provide suitable space for this purpose, particularly in town centres where trip generation is likely to be high and alternative available highways space is limited.	See above - initial MM16.2a at page 563.	September 2022
MM2.2	567	Policy T16.3 Managing the transport impacts of development, part a	Submit a transport statement or assessment in accordance with <u>regard to the latest TfL guidance</u> , which demonstrates that the scale and type of development is appropriate to the transport accessibility of the site and that proposals will not have a detrimental impact on the transport network. Mitigation measures to address adverse transport impacts, including through highways improvements and/ or financial contributions may be required to make the proposals acceptable.	See above - initial MM2.2 at Page 42	March and September 2022 – response to Inspectors’ preliminary matters
MM2.2	567	Policy T16.3 Managing the transport impacts of development, part b	Demonstrate that proposals will not result in any detrimental impact on road safety <u>can be mitigated to an acceptable degree in accordance</u> with <u>regard to</u> The Mayor’s Vision Zero target for road safety.	See above - initial MM2.2 at Page 42	September 2022 – response to Inspectors’ preliminary matters and MIQs
MM2.2	567	Policy T16.3 Managing the transport impacts of development, part c	<u>Demonstrate how trips generated by the development will be managed to maximise sustainable travel patterns and reduce reliance on vehicle trips. Developments that are expected to generate a significant number of trips will be required to develop a Travel Plan. where appropriate and in accordance with regard to TfL’s latest guidance., which sets out a strategy for managing trips to the development to maximise sustainable travel patterns.</u>	See above - initial MM2.2 at Page 42	March and September 2022 – response to Inspectors’ preliminary matters
MM2.2	567	Policy T16.3 Managing the transport impacts of development, part e	Demonstrate in accordance with TfL’s latest Construction Logistics Plan guidance , how any impacts on the transport network during the construction phase of the development will be managed and mitigated, with priority given to maintaining safe and inclusive access for pedestrians, cyclists and public transport users. <u>Developments that will have an impact on the transport network during construction will be required to develop a Construction Logistics Plan with regard to TfL’s latest guidance.</u>	See above - initial MM2.2 at Page 42	March and September 2022 – response to Inspectors’ preliminary matters

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM16.2f	567	Policy T16.3 Managing the transport impacts of development, part f	Demonstrate that the proposals and site layout make adequate provision for <u>safe and suitable access to the site for all users, particularly</u> emergency services access, deliveries, servicing, refuse collection, and visitor drop-off and pickups.	Amendment made for soundness by ensuring that it is justified and conforms with national policy	March and September 2022 – response to Inspectors MIQs
MM2.2	567	Policy T16.3 Managing the transport impacts of development, part g	<u>Demonstrate that the development will adequately</u> facilitate efficient, safe and low-emission delivery and servicing trips <u>and where a significant number of delivery trips are expected to be generated, develop a Delivery and Servicing Plan in accordance with regard to</u> TfL’s latest guidance <u>on Delivery and Servicing Plans.</u>	See above - initial MM2.2 at Page 42	March and September 2022 – response to Inspectors’ preliminary matters
MM16.2g	568	17.3.5	Developments that will be expected to generate a significant <u>amount number</u> of journeys to the site by employees, visitors, <u>students</u> or residents should also submit a travel plan in accordance with TfL’s <u>advice and guidance on Travel Plans, latest guidance.</u> A travel plan is a strategy for managing travel to a site through the introduction of a package of measures that support sustainable travel choices. <u>Developers should seek to engage with the Council and TfL at an early stage of the planning process to discuss the specific requirements for a travel plan which will be dependent on the type, scale, location and transport accessibility of the development. The travel plan will be required to monitored over a period of at least five years to ensure the development is meeting targets in relation to sustainable travel. To support this the Council will seek to secure a travel plan monitoring fee via S106 agreement for all developments that are required to submit a travel plan.</u>	To ensure that the policy is sound in conformity with national policy. Further information given on requirements for a travel plan and that a travel plan monitoring fee will be sought. <i>(incorporates former AM16.14)</i>	September 2022 – response to Inspectors’ MIQs
MM16.2h	571	Policy T16.4 Parking and Low Emissions Vehicles, part a.	Developments should provide the minimum level of car parking necessary taking into consideration the site accessibility by public transport (PTAL), in accordance with London Plan parking standards. Developments in areas with good transport accessibility, including town centres <u>and all locations with a PTAL rating of 5- 6,</u> will be expected to be car free.	To ensure conformity with London Plan and in response to Inspectors MIQs and comments from Merton Resident	September 2022 – response to Inspectors’ MIQs

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				Transport Group and Raynes Park and West Barnes Residents Association (RPWBRA)	
MM16.2i	571	Policy T16.4 Parking and Low Emissions Vehicles, part b	All new development in Controlled Parking Zones, including conversions to multiple dwellings, will be <u>required to be</u> permit free, <u>with all future occupants being ineligible for on-street parking permits in perpetuity.</u>	Wording added to policy to clarify that occupants of development in CPZ will be ineligible to apply for permits, in response to Inspectors MIQs and Regulation 19 responses.	November 2021 (previously AM 16.16) and further amended in September 2022.
MM12.2j	571	Policy T16.4 Parking and Low Emissions Vehicles, part d.	Disabled <u>persons'</u> parking should be provided in accordance with London Plan standards and should meet design guidelines , be accommodated within the development site <u>where possible</u> and be provided with electric vehicle charge points.	Policy wording amended in accordance with comments from TfL Spatial Planning and Inspectors' MIQs and to remove requirement to meet guidance.	November 2021 (previously AM 16.17) and further amended in September 2022.
MM16.2k	571	Policy T16.4 Parking and Low Emissions Vehicles, part e.	Development that provides on-site parking provision must provide electric vehicle charging infrastructure <u>which is appropriate to the scale and type of development and which meets or exceeds requirements set out in Building Regulations Approved Document S</u> and the , in accordance with London Plan standards . <u>The proposals must set out a strategy for the ongoing operation, management and maintenance of the EV charging infrastructure.</u>	Policy wording amended for soundness to ensure effectiveness and consistency with national policy in	November 2021 (previously AM 16.18) and further amended in September 2022.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				response to Inspectors' MIQs	
MM16.2l	571	Policy T16.4 Parking and Low Emissions Vehicles, part f.	Residential developments that provide parking will be expected to support car club use as an alternative to car ownership, by funding a free trial use package for new residents <u>for at least 3 years. Where required and by allocating</u> on-site parking space <u>should be allocated</u> to car club vehicles where appropriate which will be provided with electric vehicle charging infrastructure and be included within the London Plan maximum parking standards.	Policy wording amended for soundness to ensure effectiveness and consistency with London Plan in response to Inspectors' MIQs	September 2022 – response to Inspectors' MIQs
MM16.2m	571	Policy T16.4 Parking and Low Emissions Vehicles, part g.	Development that provides <u>any new or amended</u> on-site car parking provision should demonstrate <u>that the proposals do not compromise highway safety, pedestrian amenity or contribute towards flood risk. Any developments providing multiple or communal car parking spaces will be required to submit a how it will be designed and sustainably managed in accordance with TfL's latest</u> Parking Design and Management Plan guidance.	Policy wording amended in response to Inspectors' MIQs and to remove requirement to meet guidance.	September 2022 – response to Inspectors' MIQs
MM16.2i	572	17.4.4	<u>To manage on-street parking the Council has introduced Controlled Parking Zones (CPZs) into some areas of Merton (a map of existing CPZs can be viewed on Merton's website).</u> To mitigate highway impacts prevent an increase in parking pressure, the Council <u>we</u> will ensure that all new development in CPZs is permit free, with future occupants being ineligible to apply for on-street parking permits to . <u>This will be secured through a legal agreement which will include a requirement that new occupants are informed of the "permit free" status of the development.</u> The accumulation of residential conversions to multiple residential properties can place increased pressure on CPZs, so any new dwellings created through conversions, will also be expected to be permit free.	See above - initial MM16.2i at page 571.	November 2021 (previously AM 16.16) and further amended in September 2022.
MM12.2j	573	17.4.7	It is essential that disabled parking facilities are fully accommodated on site wherever possible and should be incorporated within the overall design at feasibility stage. The layout of the d Disabled parking provision should be designed in accordance with recognised design standards to be conveniently located, and provide adequate access space and be provided in accordance with recognised requirements and design standards set out in <u>London Plan Policies T6, T6.1, T6.5. ...</u>	See above - initial MM16.2j at page 571.	November 2021 (previously AM 16.17) and further amended in September 2022.
MM16.3	574	17.4.14	The Government <u>has published a decarbonising transport strategy which includes proposals to increase the uptake of electric vehicles (EVs) and end the sale of</u>	Supporting text amended and	November 2021 for

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
			new petrol and diesel cars by 2030. are progressing a strategy to significantly increase the uptake of electric vehicles (EVs) over the coming decades and confirmed in November 2020 that the UK will end the sale of new petrol and diesel cars and vans by 2030, ten years earlier than planned.	updated to include reference to the Government's recently published decarbonising transport strategy .	submission – was previously AM16.23
MM16.5	575	New paragraph below 17.4.15	Building Regulations Approved Document S: Infrastructure for the charging of electric vehicles sets out detailed requirements and technical standards that should be applied in relation to the provision of EV charging for residential and non-residential buildings that are new or undergoing major renovation or change of use. The amount of charge points provided should be in accordance with whichever is the higher applicable standard of the Building Regulations Approved Document S and London Plan (Policy T6 including T6.1- T6.4) or the latest applicable standard. Developments not covered adequately covered by these standards or where a higher level of requirement has been identified may also be required to provide an additional amount or specific type EV charging infrastructure. For example, developments generating trips by a high number of taxis or large operational vehicles may have specific requirements for rapid charging infrastructure. Parking spaces with provision for electric or other Ultra-Low Emission vehicles should be included within the maximum parking provision as set out in the London Plan and not in addition to it. For public car parking facilities, such as at retail facilities, EV infrastructure should include conveniently located fast or rapid charging facilities that enable the public to pay to charge their vehicle.	Additional paragraph linked to MM to policy T16.4e in response to the announcement of emerging Government proposals for building regulation. Also in response to Inspectors MIQs	September 2022 in response to Inspectors' MIQs.
MM18.1	After page 583	After the Appendices title page, insert a new initial appendix 'Table showing which Development Plan	[See appendix 4 to this Schedule of Main Modifications for details]	To improve clarity regarding which adopted policies are superseded by the Local Plan and to ensure the effectiveness and regulatory compliance of the Local Plan.	March 2022 – response to Inspectors' preliminary matters

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
		policies are superseded by this Local Plan'			
MM18.1a	597	Under 'Nature Conservation'	<p>Sites of Special Scientific Interest ('European Sites') <u>and Special Areas of Conservation (SAC)</u></p> <p>[in table] Site: <u>SSSI and SAC</u></p>	For clarity and accuracy and for consistency with national policy.	September 2022 - in response to Stage 2 MIQs.
MM18.1b	After page 602	After the 'Green Corridors' appendix, insert a new appendix.	[See MM Appendix 5 – Metropolitan Open Land (MOL) - boundary amendments and exceptional circumstances]	To improve clarity on changes to MOL boundaries and for consistency with national policy.	September 2022 – in response to actions arising from Stage 1 hearings.
MM2.2c	636	New glossary term after Accessibility	<p><u>Additionality</u></p> <p><u>Additionality is the principle that offsite carbon offset projects should involve projects that: would not have occurred without the offset funding; would not have occurred under a business-as-usual scenario; could not reasonably be expected to be undertaken as part of a developer's planning application; and are not required to meet national legislation. To demonstrate this, the Applicant will be expected to provide evidence, such as:</u></p> <ul style="list-style-type: none"> - <u>A business case showing that the work could not have happened as part of their existing decarbonisation plans/ regular maintenance without utilising the offset payment instead of paying it to the council; and</u> - <u>Evidence showing that the asset is not eligible for any other form of funding from national government, Mayoral programmes, etc. If the asset is eligible then the offset payment could only be used in addition to existing funding streams if it was demonstrated that it will deliver additional improvements.</u> 	See above - initial MM2.2c at Page 43	September 2022 – in response to actions arising from Stage 1 Hearings

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM18.1c	636	New glossary term after Affordable Housing	<u>Albedo</u> <u>The surface reflectivity of the sun's radiation.</u>	To improve clarity in response to the Inspector's MIQs.	September 2022 – in response to actions arising from Stage 1 Hearings
MM18.2	641	New glossary term after Convenience Retailing	<u>Conversion</u> <u>The conversion of existing single dwellings into two or more smaller dwellings.</u>	To improve clarity in response to the Inspector's MIQs.	May 2022 – in response to Inspector's MIQs.
MM12.0j	660	New glossary term after Scheduled Ancient Monument	<u>Significance (heritage)</u> <u>The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.</u>	See above - initial MM12.0j at page 402	September 2022 – in response to actions arising from Stage 1 Hearings
MM-MOL Map-01a	Map	Policies Map – Metropolitan Open Land	<i>Remove the properties at 1, 2, 2a, 3 The Cottages, Lower Morden Lane SM4 4NU from Lower Morden Metropolitan Open Land (MOL-3).</i>	This site contains 4 residential properties which do not form part of the adjoining cemetery and are physically separated. They do not meet any of the MOL criteria set out in the London Plan and officers consider that their inclusion in the MOL is an anomaly from the previous policy maps and they should be	November 2021 – for submission

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				removed to correct this error. The modifications ensure that the Local Plan is 'justified'. Refer to maps Appendix 1 for details	
MM-MOL Map-01b	Map	Policies Map – Metropolitan Open Land	<i>Slight boundary amendments around the Eveline Day Nursery SW20 9NA from Lower Morden Metropolitan Open Land (MOL-3).</i>	Corrections to the MOL boundary have been made to fix a GIS cartographic error from the Regulation 19 maps where the MOL boundary did not align with the property boundaries. The modifications ensure that the Local Plan is 'justified'. Refer to maps Appendix 1 for details	November 2021 – for submission
MM-Open Space Map-02	Map	Policies Map – Open Space	<i>Remove the properties at 1, 2, 2a, 3 The Cottages, Lower Morden Lane SM4 4NU from Merton and Sutton Joint Cemetery Surrounds Open Space (M074).</i>	This site contains 4 residential properties which do not form part of the adjoining	November 2021 – for submission

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				<p>cemetery. They do not meet the Open Space criteria set out in the Merton Green Infrastructure Study 2020. Officers consider that their inclusion in the Open Space designation is an anomaly and they should be removed. The modifications ensure that the Local Plan is 'justified'.</p> <p>Refer to map Appendix 1 for details.</p>	
MM-Open Space Map-03	Map	Policies Map – Open Space	<i>Remove part of Tooting and Mitcham Imperial Sports Ground from Open Space (P028), in accordance with approved planning application 19/P4094.</i>	In accordance with approved Planning Application 19/P4094. This is to align with the amendment made to the MOL boundary, as per the Stage 3 Policy maps. The site was reviewed by officers prior to	November 2021 – for submission

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				<p>Stage 3 consultation, however it was left off the published map in error. The modifications ensure that the Local Plan is 'justified'.</p> <p>Refer to map in Appendix 1 for details.</p>	
MM-Open Space Map-04	Map	Policies Map – Open Space	<i>Remove part of the Eastfields estate site owned by Clarion Housing Group from Streatham Park Cemetery Open Space (C004).</i>	<p>This is to align with the approved planning application 17/P1717. This change was highlighted by Clarion Housing Group through their response to the Stage 3 Local Plan consultation. The modifications ensure that the Local Plan is 'justified'.</p> <p>Refer to map Appendix 1 for details.</p>	November 2021 – for submission

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
MM-Open Space Map-04	Map	Policies Map – Open Space	<i>Remove part of the Long Bolstead Recreation Ground owned by Clarion Housing Group from Long Bolstead Recreation Ground Open Space (M060).</i>	This is to align with the approved planning application 17/P1717. This change was identified by officers following the Clarion Housing Group response to the Stage 3 Local Plan consultation. The modifications ensure that the Local Plan is 'justified'. Refer to map Appendix 1 for details.	November 2021 – for submission
MM-SINC Map-05	Map	Policies Map – Sites of Importance for Nature Conservation	<i>Wimbledon Park SINC (MeBI02) - An additional area of land needs to be included in this SINC as the land contains a number of veteran trees and other wildlife interest.</i>	Reviewed following Stage 3 Local Plan response (D .Dawson) and confirmed by Martin Boyle (LBM Greenspaces team). As part of the recent Wimbledon Park Lake project this	November 2021 – for submission

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				<p>land has been extensively surveyed and it holds nature conservation interest in line with the SINC designation. It is considered that the site was excluded in error.</p> <p>This change was identified through a Stage 3 Local Plan consultation response and has been confirmed with the Council's Ecologist. The modifications ensure that the Local Plan is 'justified'.</p> <p>Refer to map Appendix 1 for details.</p>	
MM-SINC Map -06	Map	Policies Map – Sites of Importance for Nature Conservation	<i>Myrna Close SINC (MeBII10) - The SINC boundary needs to be amended in accordance with approved planning application 16/P3430.</i>	In accordance with approved Planning Application 16/P3430 to reflect the	November 2021 – for submission

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				<p>residential properties that have been built and the new ecology area created on site. The site was reviewed by officers prior to Stage 2a consultation, however it was left off the published map in error. The modifications ensure that the Local Plan is 'justified'.</p> <p>Refer to map Appendix 1 for details.</p>	
MM-Green Corridor Map-07	Map	Policies Map – Green Corridor	<i>Ridge Road to Wimbledon Park Green Corridor (GC19) - The Green Corridor boundary needs to be amended to remove part of the Thames Water site at Byegrove Road, Colliers Wood.</i>	In discussions with Thames Water officers agree that this part of the site does not meet the Green Corridor criteria and therefore should be removed from the Policies Map. Up to date site photos were	November 2021 – for submission

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				<p>provided by Thames Water following the Stage 3 submission. The modifications ensure that the Local Plan is 'justified'.</p> <p>Refer to map Appendix 1 for details.</p>	
MM-APZs-Map-08	Map	Policies Map – Archaeological Priority Zones	<i>Removed the map showing Archaeological Priority Zones from the Policies Map.</i>	For accuracy and to ensure that the Local Plan is 'justified', this data has been removed because it has been superseded by Archaeological Priority Areas according to the latest information from Historic England.	November 2021 – for submission
MM-Conservation Areas-Map-09	Map	Policies Map Conservation Areas	<i>Added labels to the map showing the Conservation Area codes and also a table below the legend with the name of each of the Conservation Areas</i>	For clarity and to ensure the Local Plan is "justified", the Conservation Areas map has been labelled.	November 2021 – for submission

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				Refer to map Appendix 1 for details.	
MM-Listed Buildings-Map-10	Map	Policies Map Listed Buildings	<i>Updated to provide the latest information.</i>	For accuracy this map has been updated with the latest information from Historic England. This modification ensures that the Local Plan is “justified”	November 2021 – for submission
MM-Locally Listed Buildings-Map-11	Map	Policies Map Locally Listed Buildings	<i>Updated to provide the latest information.</i>	For accuracy this map has been updated with the latest information from Merton Council. This modification ensures that the Local Plan is “justified”. Refer to map Appendix 1 for details.	November 2021 – for submission
MM-Wandle Trail/ National Cycle Network Route 20 (NCN20)- Map-12	Map	Policies Map Wandle Trail/ National Cycle Network Route 20 (NCN20)	<i>New map to highlight the cycle routes that are part of the Wandle Trail</i>	For clarity the cycle network that is part of the Wandle Trail has been added as a separate map to highlight its importance in enabling active travel choices.	November 2021 – for submission. September 2022 – in response to Stage 2 MIQs.

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				<p>This change was requested at the Stage 3 consultation from the Wandle Valley Forum.</p> <p>The name of the map has also been updated to improve clarity.</p> <p>Refer to map Appendix 1 for details.</p>	
MM-Wandle Trail proposed "missing link" route- Map-13	Map	Policies Map New map Wandle Trail proposed "missing link" route - Map13	<i>Cycle network routes have been updated to show the Wandle Missing Link</i>	<p>For accuracy and to ensure that the Local Plan is 'justified', the cycle network map has been updated to reflect the latest agreement on the Wandle Missing Link on the borough boundary between Merton and Wandsworth.</p> <p>The name of the map has also been updated to improve clarity.</p>	<p>November 2021 – for submission</p> <p>September 2022 – in response to Stage 2 MIQs.</p>

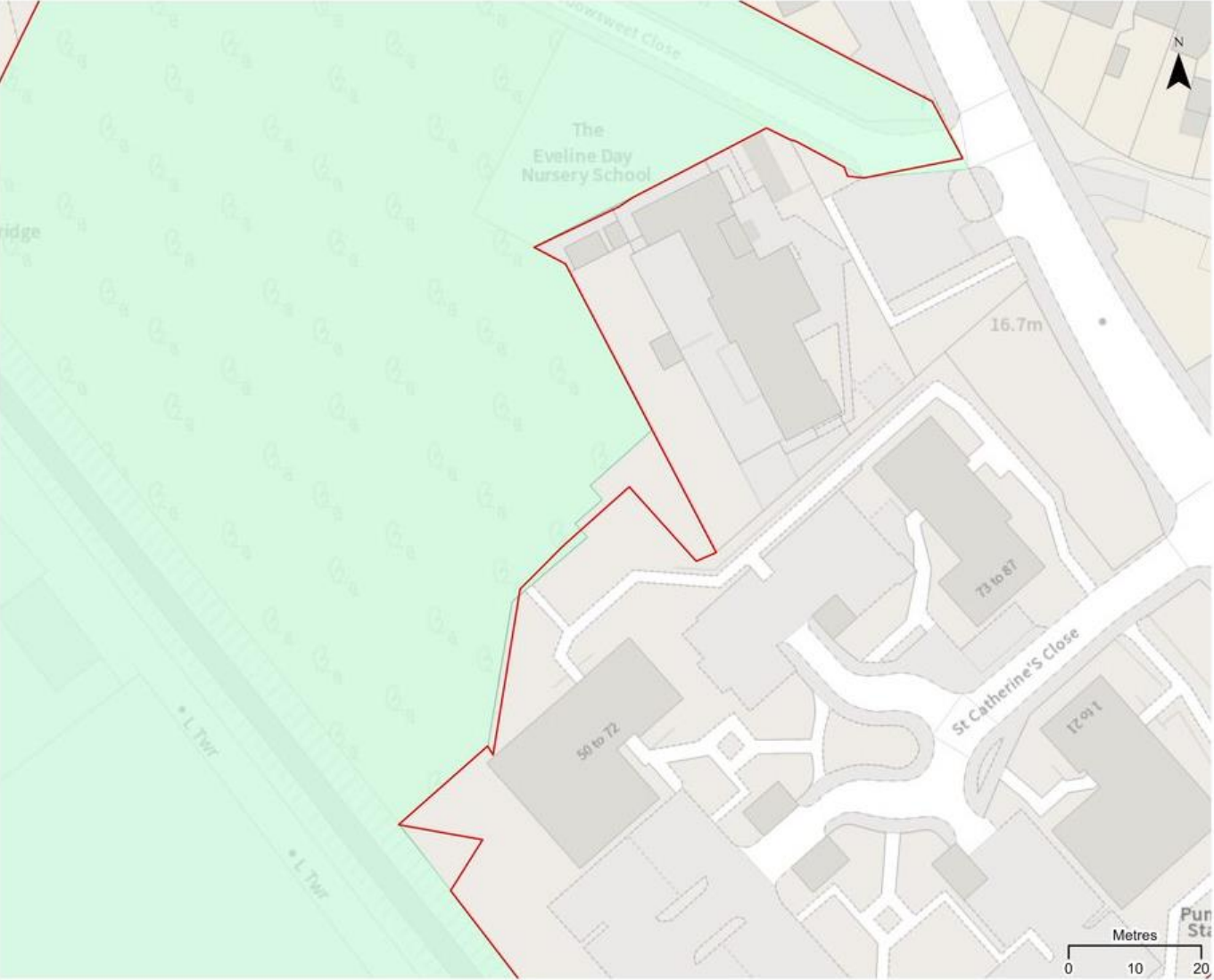
Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				Refer to map Appendix 1 for details.	
MM19.1	After page 665	Insert new policy chapter M19.1 Monitoring	<i>Refer to Appendix 3 for new policy wording</i>	<p>To improve clarity of the proposed monitoring arrangements that will gauge the effectiveness of the policies and will help to inform the Local Plan review process, and therefore ensure the overall soundness of the Local Plan.</p> <p>Modified to improve clarity on the monitoring requirements for Merton's Climate Change policies in response to the Inspector's Matters, Issues & Questions.</p> <p>Modified to improve clarity on the monitoring requirements for</p>	<p>March 2022 – response to Inspectors' preliminary matters</p> <p>May 2022 – response to Inspector's Matters, Issues & Questions.</p> <p>September 2022 – in response to actions arising from Stage 1 Hearings</p>

Mod Ref.	Page	Plan Ref.	Proposed Changes	Reason	Date made
				<ul style="list-style-type: none"> • Merton's Housing Policies (Gypsies and Travellers) • biodiversity net gain and open space in response to June 2022 Stage 1 hearing actions. 	

MM Appendix 1 – November 2021 for submission



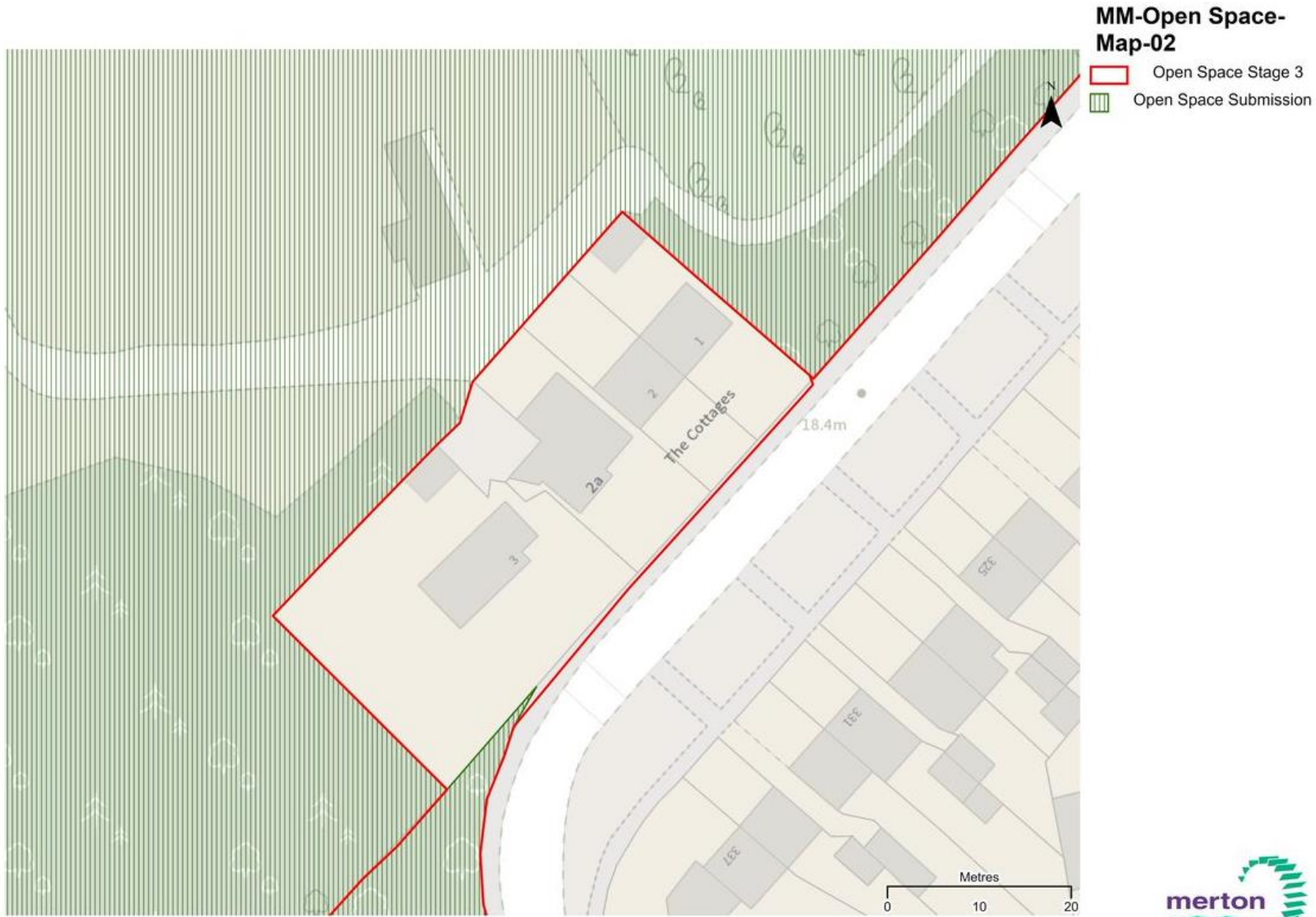
MM-MOL-Map-01b



- MOL Stage 3
- MOL Submission

Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)





Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)





MM-Open Space-Map-03

- Open Space Stage 3
- Open Space Submission

Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)

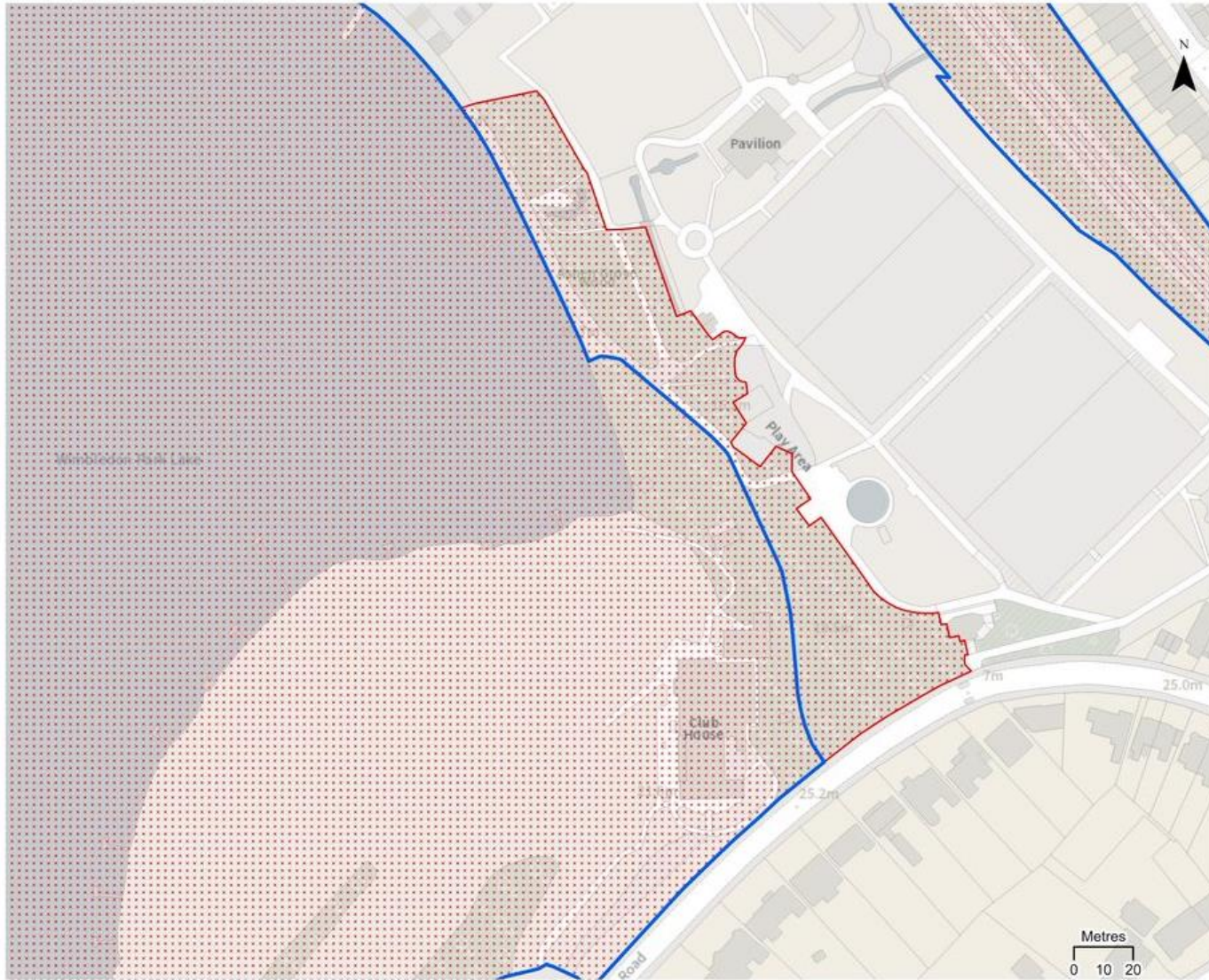






Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)



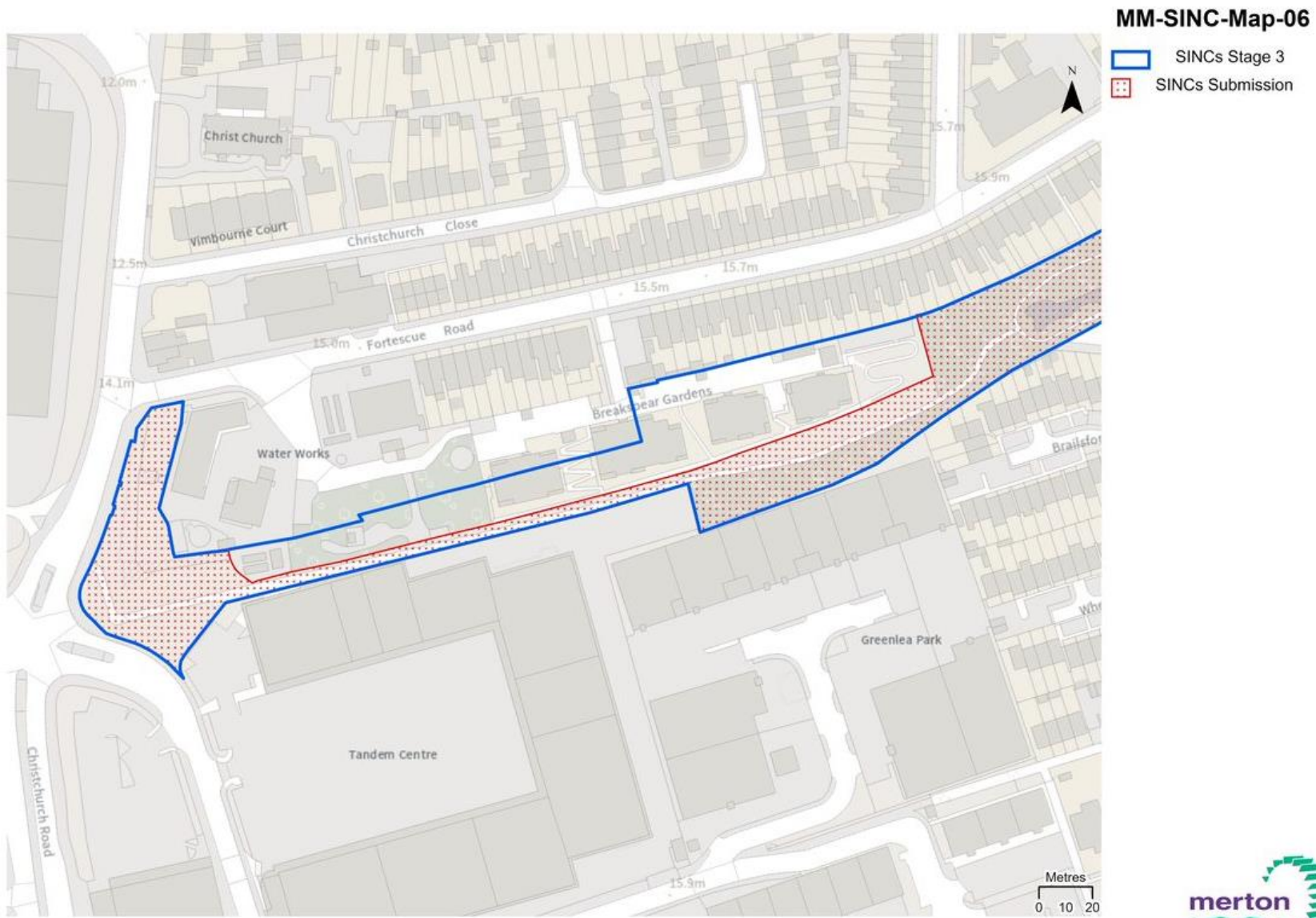
MM-SINC-Map-05



-  SINC Stage 3
-  SINC Submission

Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)





Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)





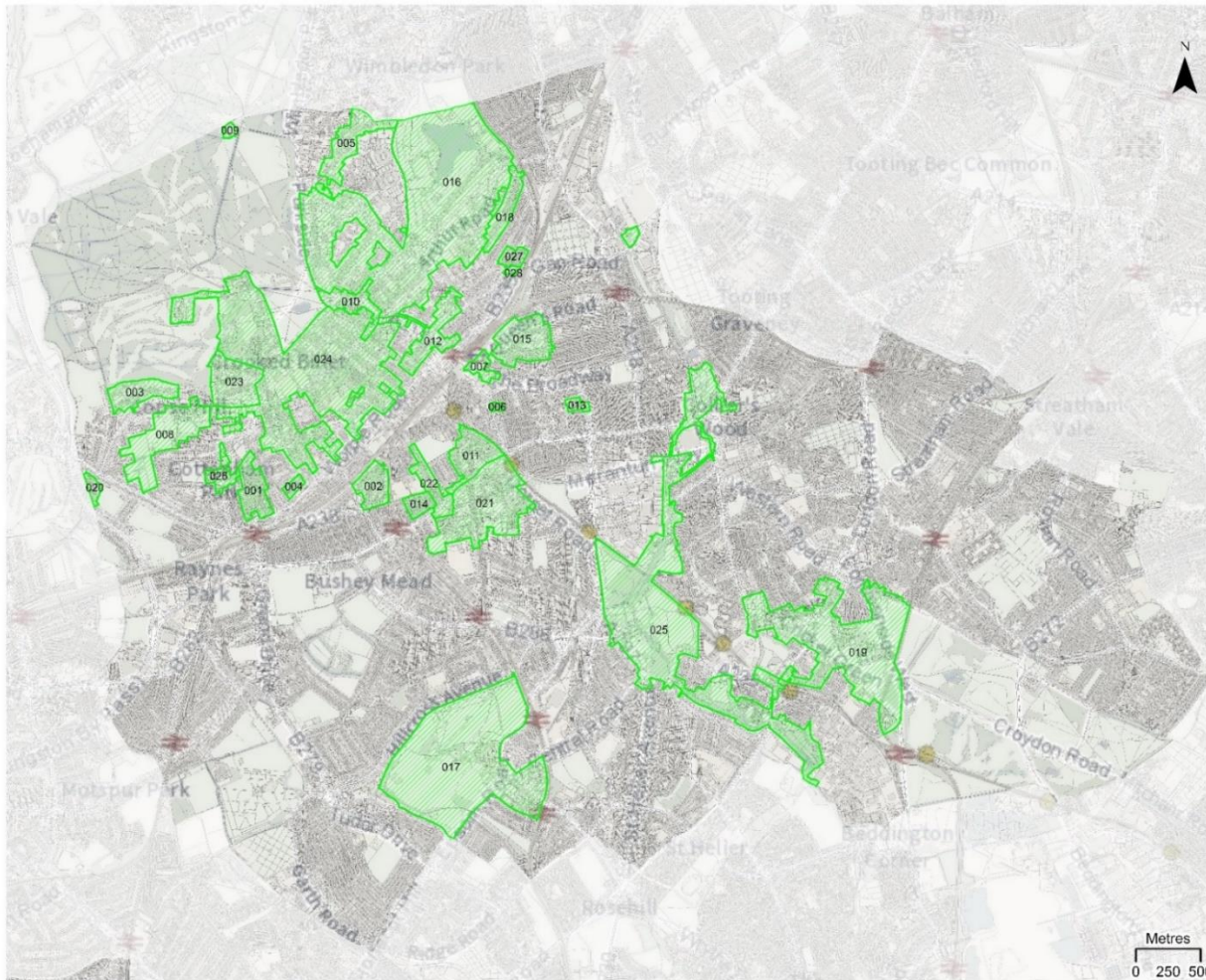
MM-Green Corridor-Map-07

- Green Corridors Submission
- Green Corridors Stage 3

Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)



MM-Conservation Areas-Map-09



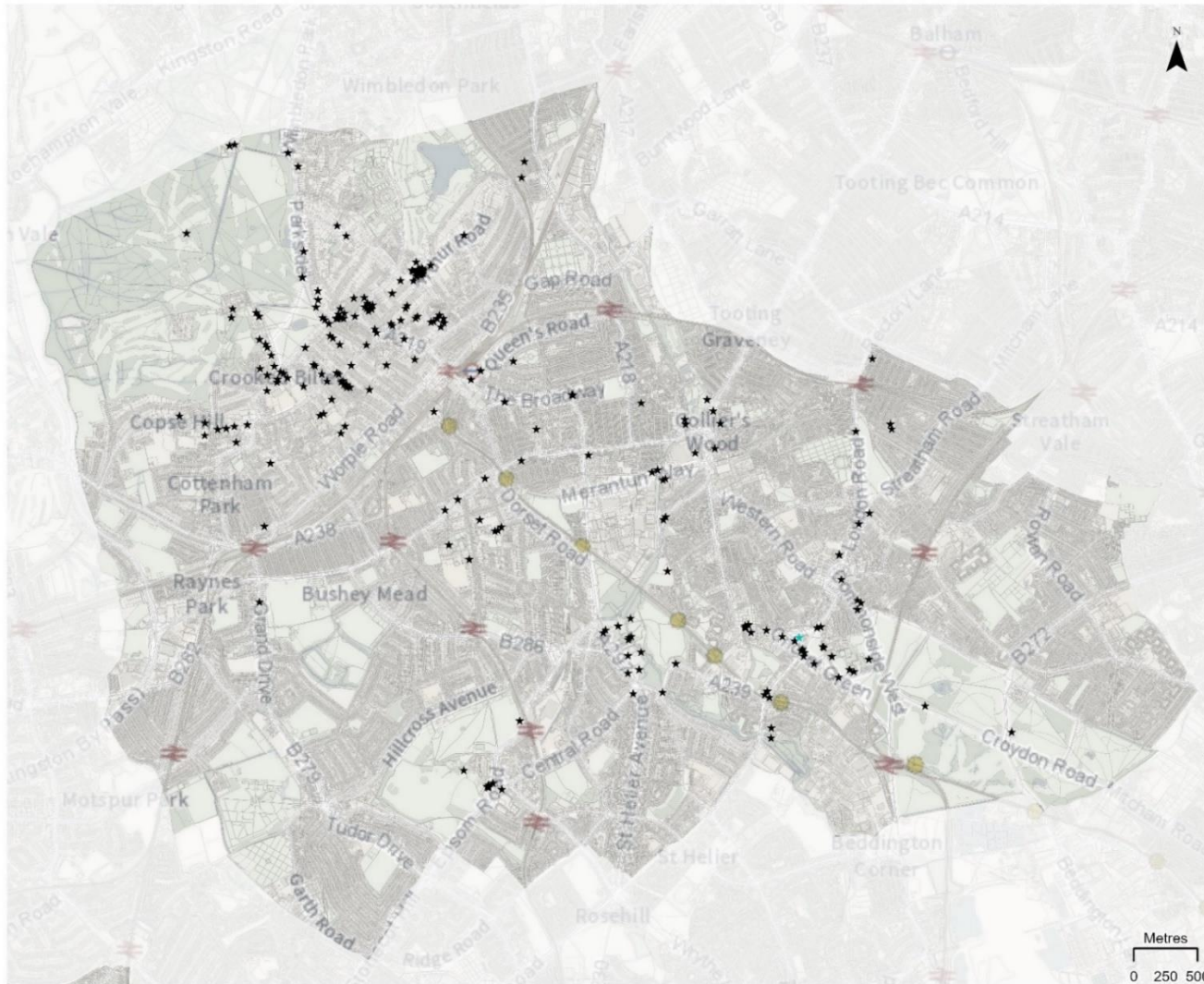
 Conservation Areas

Area Code	Area Name
001	Lambton Road
002	Dennis Park Crescent
003	Drax Avenue
004	Dunmore Road
005	Bathgate Road
006	Bertram Cottages
007	The Broadway
008	Copse Hill
009	Wimbledon Windmill
010	Wimbledon Village
011	John Innes- Wilton Crescent
012	Wimbledon Hill Road
013	Pelham Road
014	Wimbledon Chase
015	South Park Gardens
016	Wimbledon North
017	Upper Morden
018	Vineyard Hill Road
019	Mitcham Cricket Green
020	Westcoombe Avenue
021	John Innes- Merton Park
022	Merton Hall Road
023	Wool Road
024	Wimbledon West
025	Wandle Valley
026	Durham Road
027	Kenilworth Avenue
028	Leopold Road

Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)



MM-Listed Buildings-Map-10

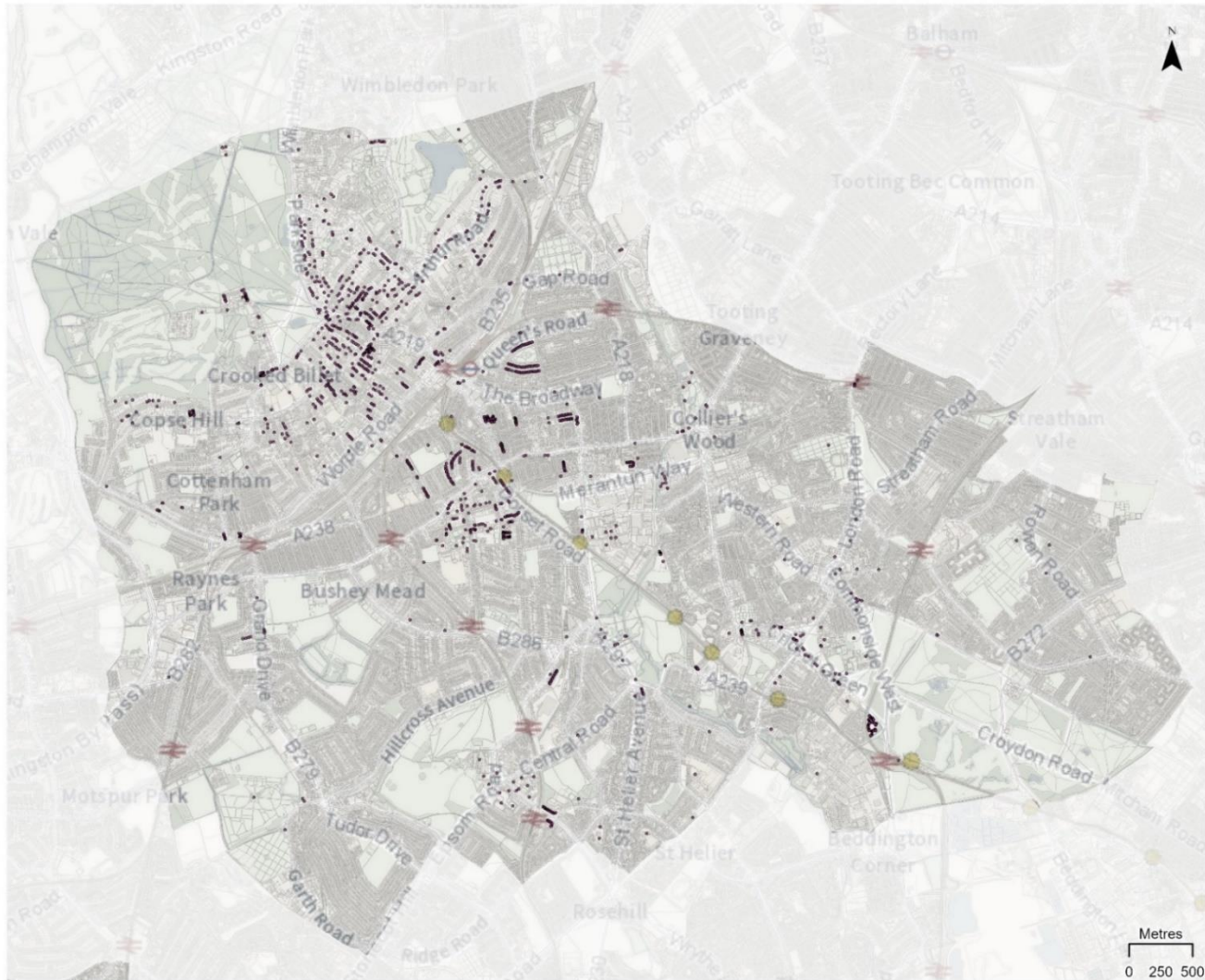


★ Listed Buildings

Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)



MM-Locally Listed Buildings-Map-11

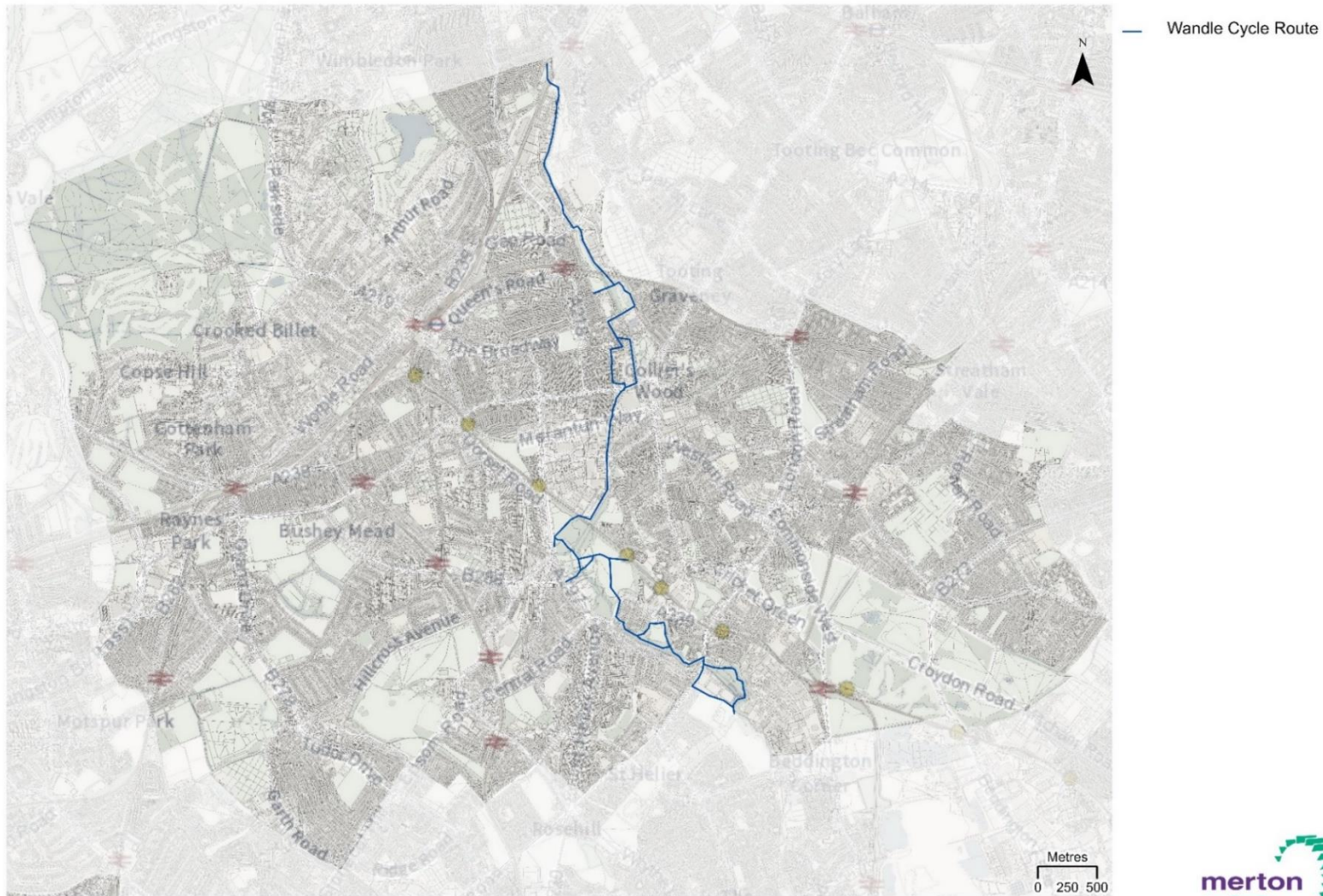


● Locally Listed Buildings

Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)



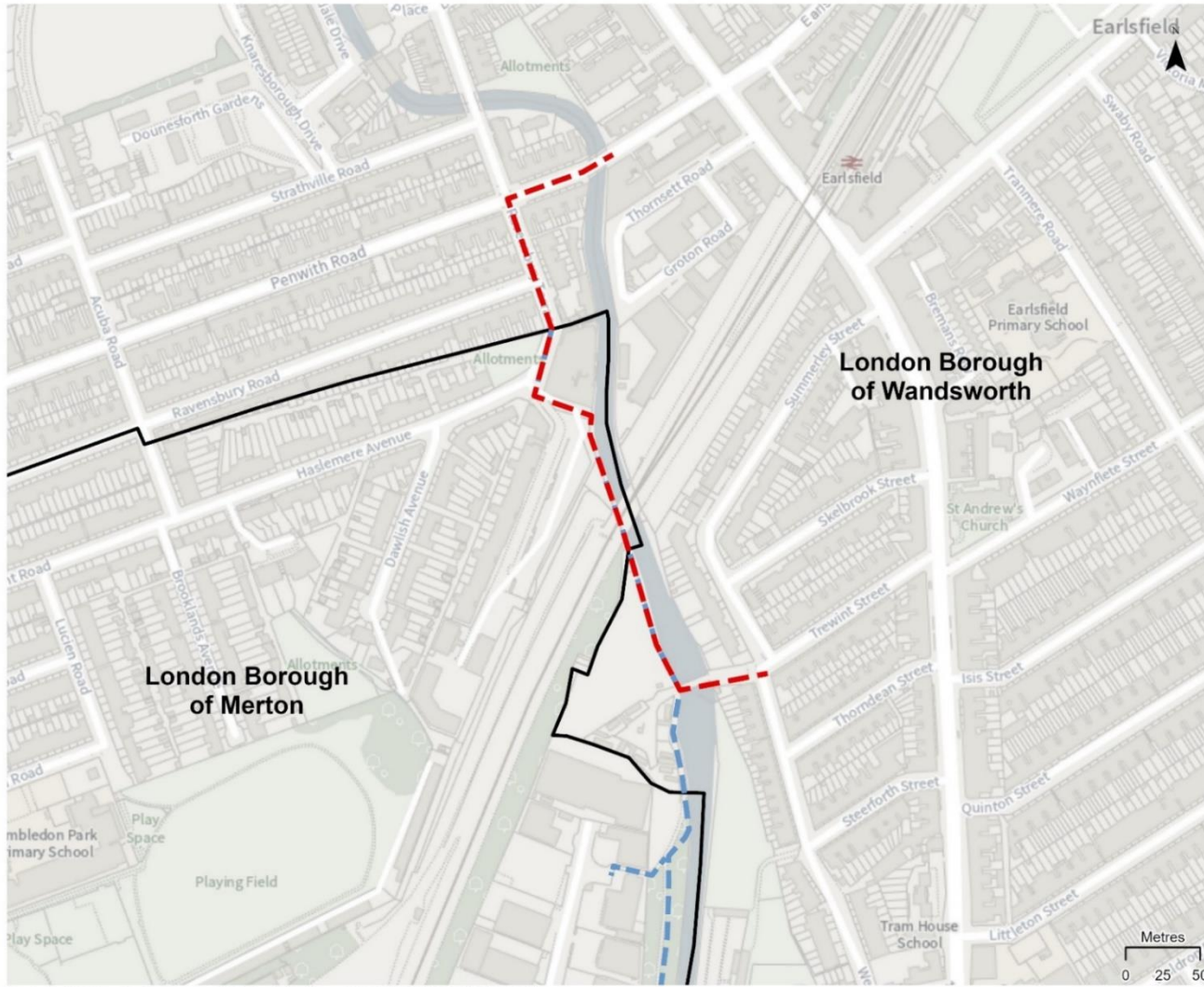
MM-Wandle Trail/ Cycle Network Route 20 (NCN20)-Map-12



Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)



MM-Wandle Trail proposed 'missing link' route-Map13

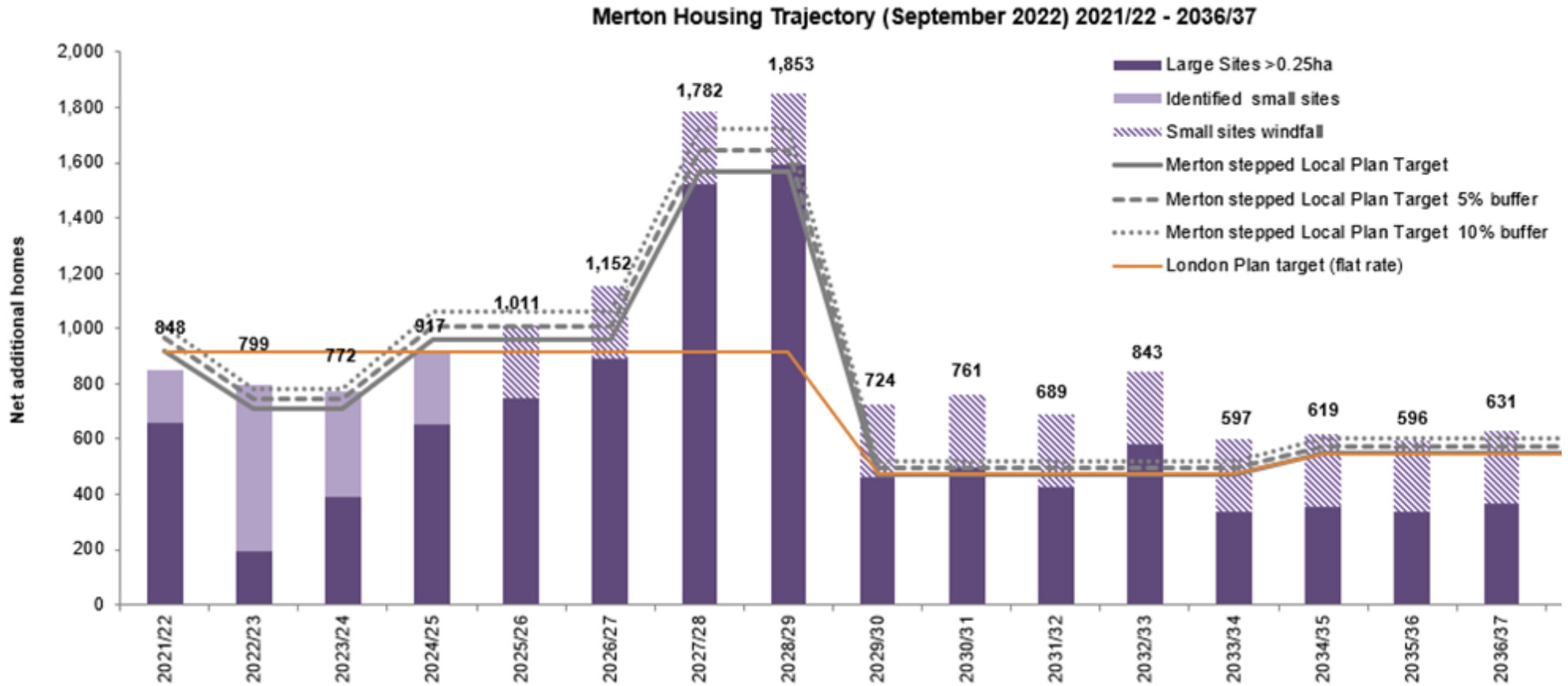


- Merton Cycle Network
- Wandle Missing Link
- Merton Borough Boundary

Contains OS data © Crown copyright [and database rights] (2021) OS (100019259)



MM Appendix 2 – page 349 (MM1.1)- Figure 11.2.1 Merton’s Housing Trajectory for the Plan period 2021/22 to 2036/37





CHAPTER 19. MONITORING

Policy M19.1 Monitoring

- a. Merton Council will demonstrate the delivery of the Local Plan's spatial vision and strategic objectives by monitoring the implementation of policies and infrastructure.
- b. A key Indicator for the effectiveness of Local Plan policies will be Appeal decisions from the Planning Inspectorate, especially where an appeal is upheld when the council refused permission.
- c. In the event that delivery falls significantly below what is required to achieve the necessary targets, the council will trigger a full or partial review of the plan in order to address the reasons for under delivery.

Supporting Text

19.1.1. Monitoring the Local Plan is crucial to the successful delivery of its vision and strategic objectives.

19.1.2. Section 113 of the Localism Act 2011 sets out the requirements for Authority Monitoring Reports (AMRs). Regulation 34 of The Town and Country Planning (Local Planning) (England) Regulations 2012 provides further detail on these requirements which are also reflected in the National Planning Practice Guidance (NPPG) on Local Plans.

19.1.3. Monitoring is required to ensure that the policies are relevant and effective. Monitoring allows us to understand whether policies have worked as they were intended.

19.1.4. Currently, the council has no reason to believe that the plan will not be implemented in full. However, the council accepts that there could be circumstances where development fails to come forward for a number of reasons, some of which are beyond the control of the council. These could include delivery challenges on a site or a more general slowdown in the economy and its ability to deliver viable development. Where the council can use its powers and influence to enable or support delivery of the Local Plan, it will proactively consider the case for doing so.

Local Plan monitoring framework

19.1.5. The monitoring framework sets out the monitoring indicators for the Local Plan, which will be reported in the Authority Monitoring Report (AMR). The AMR is not the only monitoring tool. There are separate monitoring arrangements of other related strategies, for example,

the climate change strategy and action plan, and the South London Waste Plan. The monitoring framework below relates to the performance of this Local Plan.

19.1.6. Regular monitoring will include analysis of delivery data and trends and Appeal decisions where the council refused a planning application but permission allowed on Appeal. In addition taking account of changes in legislation at the regional and national level. Reviewing the plan's supporting evidence base where necessary. If, as a result of monitoring, issues are identified in terms of a policy not achieving its intended outcome, or key policy and delivery targets are not being met, this may give rise to either a full or partial review of the Local Plan and its policies.

Reviewing the plan

19.1.7. As required by the NPPF and Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012, the council will initiate a review of the plan within five years of adoption.

Local Plan Monitoring Framework

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency/ Action</u>	<u>Local Plan policy</u>
<u>Growth Area (Opportunity Area)</u>	<u>Number of planning permissions granted for sites within Merton's Opportunity Area as set out in Chapter 1: Growth Strategy)</u>	<p><u>London Plan indicative target (up to 2041) to deliver 5,000 new homes and 6,000 jobs (indicative figure).</u></p> <p><u>Cumulative housing completions since OA designation.</u></p> <p><u>Cumulative non-residential floorspace approvals and completions since OA designation.</u></p> <p><u>Delivery of infrastructure to support major developments in the growth area.</u></p>	<p><u>Non delivery of net new homes in identified growth areas over a rolling three year period</u></p> <p><u>Non delivery of non residential floorspace in identified growth area over a rolling three year period.</u></p> <p><u>GLA to produce an Opportunity Area Planning Frameworks (OAPFs) in accordance with London Plan policy SD1 Opportunity Areas.</u></p>	<p><u>Council to consider the reasons for any imbalance in delivery of homes, offices and businesses in the OA.</u></p> <p><u>Council to consider whether the Growth Strategy needs to be reviewed and/or part review or full review of the Local Plan.</u></p>	<p><u>Chapter 1B: Growth Strategy)</u></p> <p><u>Neighbourhood policies:</u> <u>Colliers Wood: Policy N3.1</u> <u>Morden: Policy N5.1</u> <u>South Wimbledon: Policy N7.1</u> <u>Wimbledon: Policy N9.1</u></p> <p><u>Site allocations within the OA.</u></p> <p><u>Strategic policy EC13.1 Promoting economic growth and successful high streets</u></p> <p><u>Policy EC13.2 Business locations in Merton</u></p>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency/ Action</u>	<u>Local Plan policy</u>
					<p><u>Policy TC 13.5 Merton’s town centres and neighbourhood parades</u></p> <p><u>Strategic policy IN 14.1 Infrastructure</u></p>
<p><u>Air quality</u></p> <p><u>To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure.</u></p>	<p><u>Appeals decisions</u></p> <p><u>Number of days p.a. when air pollution is moderate or high for PM10*</u></p> <p><u>*Daily mean particles (PM10) not to exceed 50 micrograms per cubic metre - more than 35 times a year at any measuring site.</u></p>	<p><u>Decreasing number of days of high PM10 over a 3-year period.</u></p>	<p><u>Appeal decisions allowed on Appeal where the council refused planning permission for development in the Air Quality Management Area which has an unacceptable impact on air quality and wellbeing of people.</u></p>	<p><u>The council to consider the circumstances of the decision that have led to the trigger.</u></p> <p><u>Consider whether the policy requirements need to be reviewed as part of a full or partial review of the Local Plan.</u></p>	<p><u>Policy P15.10 Improving Air Quality and Minimising Pollution</u></p> <p><u>Policy CC2.2 Minimising Greenhouse Gas Emissions Strategic Policy O15.1 Open Space, Green Infrastructure and Nature Conservation</u></p> <p><u>Policy T16.3 Managing the transport impacts of development</u></p>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency/ Action</u>	<u>Local Plan policy</u>
<p><u>Biodiversity</u></p> <p><u>To protect and conserve Merton’s biodiversity from adverse development, avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).</u></p>	<p><u>Appeals decisions</u></p> <p><u>Changes in areas of biodiversity importance.</u></p> <p><u>Biodiversity Net Gain delivered across Merton.</u></p> <p><u>Number of new Tree Protection Orders</u></p> <p><u>Number of Tree Protection Orders where trees have been removed</u></p>	<p><u>No net loss of sites of importance for nature conservation (SINCS).</u></p>	<p><u>Annual increase in appeal decisions allowed where the council refused planning permission for development that would have an adverse impact on international, national or local designed sites.</u></p> <p><u>Annual increase in appeal decisions allowed where the council refused planning permission for developments that do not adequately avoid or mitigate impacts on biodiversity and geodiversity</u></p>	<p><u>The council to consider the circumstances of the decision that have led to the trigger.</u></p> <p><u>The council to consider whether the policy requirements need to be reviewed as part of a partial or full review of the Local Plan.</u></p>	<p><u>Policy O15.3 Biodiversity and Access to Nature</u></p> <p><u>Policy O15.4 Protection of Trees</u></p> <p><u>Policy O15.5 Urban Greening</u></p> <p><u>Policy O15.6 Wandle Valley Regional Park</u></p>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency/ Action</u>	<u>Local Plan policy</u>
			<u>Annual increase in appeal decisions allowed on appeal where the council refused planning permission for development that results in unacceptable harm or loss of a tree/trees.</u>		
<p><u>Land and soil condition and pollutants</u></p> <p><u>To conserve Merton's geodiversity and protect soils from development and over intensive use.</u></p>	<p><u>Appeals decisions</u></p> <p><u>Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.</u></p>		<p><u>Appeal decisions on appeal where the council refused planning permission for hazardous substances sites or land which is considered a threat to health or safety of future users and/or has an adverse impact on the quality of</u></p>	<p><u>Consider the circumstances of the decisions that have led to the trigger.</u></p> <p><u>The council to consider whether the policy requirement needs to be review as part of a full or partial review of the Local Plan</u></p>	<p><u>Policy P15.10 Improving Air Quality and Minimising Pollution</u></p>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency/ Action</u>	<u>Local Plan policy</u>
			<u>ground water or surface water.</u>		
<p><u>Sustainable land use</u></p> <p><u>To make the best and most efficient use of land to support sustainable patterns and forms of development.</u></p> <p><u>To achieve a holistic approach to sustainable design and construction (BREEM).</u></p>	<p><u>Planning permissions granted and completed.</u></p> <p><u>Monitoring changes to industry standards for sustainable design and construction</u></p> <p><u>Changes to industry standards for sustainable design and construction or changes to national or regional planning</u></p>	<p><u>95% of major planning permissions started within a 3 year period.</u></p>	<p><u>Annual increase in allowed appeal decisions where the council refused a planning permission for tall buildings that does not meet the borough's tall building policy (D12.6).</u></p> <p><u>The council to consider whether the climate changes policy requirements need to be reviewed as</u></p>	<p><u>Council to consider the circumstance of the decision that have led to the trigger and consider whether the policy requirements need to be reviewed as part of a partial or full Local Plan review.</u></p>	<p><u>Strategic Policy D12.1 Delivering well designed and resilient neighbourhoods.</u></p> <p><u>Policy D12.2 Urban design</u></p> <p><u>Policy T16.5 Supporting transport infrastructure</u></p> <p><u>Policy D12.6 Tall buildings</u></p>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency/ Action</u>	<u>Local Plan policy</u>
	<u>policies and regulations.</u>		<u>part of a full or partial review of the Local Plan.</u>		
<p><u>Heritage (including architectural and archaeological heritage)</u></p> <p><u>To conserve and enhance the existing historic and built environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural, through high quality design and protection of open space, valued views and historic assets.</u></p>	<p><u>Appeal decisions allowed</u></p> <p><u>Number of heritage assets on Historic England’s Heritage at Risk Register.</u></p>	<p><u>n/a</u></p> <p><u>A reduction in the number of heritage assets on the Heritage at Risk register.</u></p>	<p><u>Appeal decisions allowed where the council refused planning permission for development that is deemed not conserve or enhance or lead to unacceptable harm to the existing built environment, Heritage (including architectural and archaeological heritage) interest and their setting, architectural and archaeological, Registered Parks or Gardens.</u></p>	<p><u>Consider how the council can contribute to measures to improve the protection of significant non-designated heritage assets.</u></p> <p><u>The council to consider whether the policy requirement needs to be review as part of a full or partial review of the Local Plan</u></p>	<p><u>Policy D12.3 Ensuring high quality design for all developments</u></p> <p><u>Policy D12.5 Managing heritage assets</u></p>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency/ Action</u>	<u>Local Plan policy</u>
<p><u>Flood risk management</u></p> <p><u>To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.</u></p>	<p><u>Number of planning permissions granted (either by the council or on appeal) contrary to Environment Agency advice.</u></p> <p><u>Number and location of Environment Agency flood warnings issued across Merton each year.</u></p>	<p><u>No planning permissions granted contrary to Environment Agency advice</u></p>	<p><u>Appeal decisions allowed where the council refused planning for development that results in unacceptable flood risk.</u></p> <p><u>Increase of granted permission contrary to the Environment Agency year on year.</u></p>	<p><u>The council to consider whether the policy requirement needs to be review as part of a full or partial review of the Local Plan</u></p>	<p><u>Strategic Policy F15.7 Flood Risk Management and Sustainable Drainage</u></p> <p><u>Policy F15.9 Sustainable Drainage Systems (SUDS)</u></p>
<p><u>Climate change</u></p> <p><u>Operational carbon savings - to help tackle climate change through reducing greenhouse gas emissions and moving towards a</u></p>	<p><u>Appeal decisions</u></p> <p><u>Average percentage improvement in operational carbon emissions against Part L of the Building Regulations.</u></p>	<p><u>Carbon reduction targets set out in policy CC2.2.</u></p>	<p><u>Changes to Part L of the Building Regulations</u></p>	<p><u>The council to consider any changes to Part L of Building Regulations an whether Policy CC2.2 requirements</u></p>	<p><u>Strategic Policy CC2.1 Promoting Sustainable Design to Mitigate and Adapt to Climate Change</u></p> <p><u>Policy CC2.2 Minimising</u></p>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency/ Action</u>	<u>Local Plan policy</u>
<p><u>zero carbon Merton by 2050.</u></p> <p><u>Carbon offsetting - offset any carbon shortfall from development where zero carbon cannot be achieved on site.</u></p>	<p><u>Monitoring changes to the carbon offset price.</u></p>	<p><u>Increase in percentage of relevant proposals where Carbon offsetting proposed where on site reduction is not achievable.</u></p>	<p><u>Reporting on carbon offsetting in Infrastructure Funding Statement.</u></p> <p><u>Appeal decisions allowed on appeal where the council refused planning permission for renewable and low carbon energy development</u></p>	<p><u>needs to be reviewed as part of a full or partial review of the Local Plan</u></p> <p><u>The council to consider the circumstances of the decisions that have led to the trigger.</u></p> <p><u>The council to consider whether the climate change policies requirements need to be reviewed as part of a full or partial review of the Local Plan</u></p>	<p><u>Greenhouse Gas Emissions</u></p> <p><u>Policy CC2.3 Minimising Energy Use</u></p> <p><u>Policy CC2.4 Low Carbon Energy</u></p> <p><u>Policy CC2.5 Minimising Waste and Promoting a Circular Economy</u></p> <p><u>Policy CC2.6 Sustainable Design Standards</u></p>
<p><u>Energy use</u></p> <p><u>To manage and reduce demand for energy.</u></p>	<p><u>Appeal decisions</u></p> <p><u>Energy Use Intensity (kWh/m2/yr.) for developments</u></p>	<p><u>Energy Use Intensity targets set out in policy CC2.3 from 2025</u></p>	<p><u>Appeal decisions allowed on appeal where the council refused planning for development</u></p>	<p><u>The council to consider whether the climate change policies requirements need</u></p>	<p><u>Policy CC2.2 Minimising Greenhouse Gas Emissions</u></p>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency/ Action</u>	<u>Local Plan policy</u>
<u>To manage and reduce embodied carbon.</u>	<u>Embodied carbon (kgCO2/m2) from large developments which submit a Whole Life Cycle Assessment.</u>		<u>that do not meet the targets set out in policy CC2.3 from 2025.</u>	<u>to be reviewed as part of a full or partial review of the Local Plan.</u>	<u>Policy CC2.3 Minimising Energy Use</u>
<u>Noise and vibration</u> <u>To minimise noise, vibration levels and disruption to people and communities.</u>	<u>An increase in area of the Noise Action Planning Important Areas.</u>	<u>No increase to area.</u>	<u>Appeal decisions allowed on appeal where the council refused planning permission on the ground that development would have an adverse impact or does not full mitigate or reduce noise impact.</u>	<u>The council to consider whether policy requirements need to be reviewed as part of a full or partial review of the Local Plan</u>	<u>Policy P15.10 Improving Air Quality and Minimising Pollution</u>
<u>Water quality</u> <u>To protect and enhance Merton's water bodies.</u>	<u>Water quality status of water bodies across borough.</u>	<u>No decrease of the Water Framework Directive classification of</u>	<u>Changes to the water quality status of water bodies in Merton.</u>	<u>The council to consider whether policy requirements need to be reviewed as part of</u>	<u>Strategic Policy F15.7 Flood Risk Management and Sustainable Drainage</u>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency/ Action</u>	<u>Local Plan policy</u>
	<p><u>Number of developments approved against the recommendation of the statutory water / sewerage undertaker on low pressure / flooding grounds.</u></p> <p><u>Metres of main river improved and restored across Merton.</u></p>	<p><u>'good' ecological status.</u> <u>No planning permissions granted against Environment Agency recommendations.</u></p> <p><u>Increase in main river improvements and restoration</u></p>		<p><u>a full or partial review of the Local Plan.</u></p>	<p><u>Policy F15.9 Sustainable Drainage Systems (SUDS)</u></p> <p><u>Policy F15.8 Managing Local Flooding</u></p> <p><u>Strategic Policy O15.1 Open Space, Green Infrastructure and Nature Conservation</u></p>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency/ Action</u>	<u>Local Plan policy</u>
<p><u>Water consumption</u></p> <p><u>Ensuring that Merton has a sustainable water supply, drainage and sewerage system.</u></p>	<p><u>Number of buildings not achieving Building Regulation the minimum water consumption target of 105 litres/person/day.</u></p>	<p><u>Proportion of new residential developments with a maximum water consumption target of 105 litres/person/day.</u></p>	<p><u>20% of new buildings of new buildings are not meeting the policy requirement of minimum water consumption target.</u></p>	<p><u>The council to consider whether policy requirements need to be reviewed as part of a full or partial review of the Local Plan.</u></p>	<p><u>Policy CC2.6 Sustainable Design Standards</u></p>
<p><u>Open space and nature</u></p> <p><u>To protect and enhance Merton's open spaces and natural environment and improve connectivity to and between open spaces.</u></p>	<p><u>Net loss of designated open space for development.</u></p> <p><u>Number of major developments that exceed the Urban Greening Factor targets.</u></p>	<p><u>No net loss of designated open space.</u></p> <p><u>London Plan Policy G5, 0.4 for major residential</u></p>	<p><u>Decisions allowed on appeal where the council refused planning permission that would result in net loss of open space.</u></p> <p><u>Appeal decisions allowed on appeal where the council</u></p>	<p><u>The council to consider whether policy requirements need to be reviewed as part of a full or partial review of the Local Plan.</u></p>	<p><u>Strategic Policy O15.1 Open Space, Green Infrastructure and Nature Conservation</u></p> <p><u>Policy O15.2 Open Space and Green Infrastructure</u></p>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency/ Action</u>	<u>Local Plan policy</u>
		<u>developments and 0.3 for major commercial developments.</u>	<u>refused planning permission for not providing an Urban Greening within major developments.</u>		<u>Policy O15.3 Biodiversity and Access to Nature</u> <u>Policy O15.5 Urban Greening</u>
<u>Sustainable transport</u> <u>To enhance connectivity for all and increase the proportion of journeys made by sustainable and active transport modes.</u>	<u>Overall sustainable mode share.</u> <u>Uptake of low emission vehicles</u>	<u>Increase in overall sustainable mode share based on a rolling three year average - 73% by 2041.</u> <u>Increase in registered EV vehicles in Merton – measured annually.</u>	<u>Reporting identifies under performance on trajectory to meet target for overall sustainable travel mode share.</u>	<u>The council to consider whether policy requirements need to be reviewed as part of a full or partial review of the Local Plan</u>	<u>Strategic Policy T16.1 Sustainable Travel</u> <u>Policy T16.4 Parking and Low Emissions Vehicles.</u>
<u>Health and wellbeing</u> <u>To facilitate and improve the health and wellbeing of</u>	<u>Delivery of healthcare facilities identified in Merton’s</u>	<u>(Monitoring will be reported in the Health and</u>	<u>n/a</u>	<u>The council to consider whether the policy</u>	

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency/ Action</u>	<u>Local Plan policy</u>
<p><u>the population, reduce health inequalities and deliver safer and more secure communities.</u></p>	<p><u>Local Plan and Infrastructure Delivery Plan.</u></p> <p><u>Number of people taking up physical activities and stating they are in ‘good health.’</u></p> <p><u>Number of Health Impact Assessments (HIA) carried out in accordance with policy.</u></p> <p><u>Manage and monitor proposals for new hot food takeaways found within 400 metres of the boundaries of a primary or secondary school.</u></p>	<p><u>Wellbeing Strategy annual update known as the Merton Story and added to the AMR).</u></p> <p><u>n/a</u></p> <p><u>All development proposals that meet the Local Plan policy requirements to submit a Health Impact Assessment.</u></p> <p><u>No over-concentration of hot food takeaways in accordance with planning policy (TC13.8).</u></p>	<p><u>n/a</u></p>	<p><u>requirements need to be review as part of a partial or full review of the Plan.</u></p>	<p><u>Policy HW10.2: Delivering healthy places.</u></p> <p><u>Policy TC13.8 Food and drink / leisure and entertainment</u></p>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency/ Action</u>	<u>Local Plan policy</u>
<p><u>Housing</u></p> <p><u>To provide type, quality and tenure of housing (including specialist and affordable provision) to better meet Merton’s demographic changes and local housing demand.</u></p>	<p><u>Number of homes built each year.</u></p> <p><u>Appeals decisions.</u></p> <p><u>Progress against borough wide affordable housing targets.</u></p>	<p><u>Building regulation M4(3) – 10% of all new build self-contained homes.</u></p> <p><u>M4(2) – 90% of all new build self-contained homes.</u></p> <p><u>50% of new homes borough-wide to be affordable across the plan period.</u></p> <p><u>Of affordable homes, 70% to be low-cost rent</u></p> <p><u>30% to be intermediate tenure.</u></p>	<p><u>Housing Delivery Test</u></p> <p><u>Housing completions fall more than 20% beneath the targets in the housing trajectory over any rolling 3-year period.</u></p>	<p><u>Consider the circumstance that has led to the trigger.</u></p> <p><u>Identify any consistence factors contributing towards trigger and consider how these can be resolved.</u></p> <p><u>The council to consider whether the policy requirements need to be review as part of a partial or full review of the Plan.</u></p>	<p><u>Strategic Policy No. H11.1 Housing choice</u></p> <p><u>Strategic policy No. H11.2 Housing Provision</u></p> <p><u>Policy No. H11.3 Housing mix</u></p> <p><u>Policy No. H11.4 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system.</u></p> <p><u>Policy No. H11.5 Student Housing, other housing with shared facilities and bedsits</u></p>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency/ Action</u>	<u>Local Plan policy</u>
<p><u>Safe environments</u></p> <p><u>To contribute to safe and secure environments for all people including people with Protected Characteristics.</u></p>	<p><u>Appeal decisions</u></p>	<p><u>Number of decisions made against the advice of the Metropolitan Police Designing Out Crime Officer.</u></p>	<p><u>Appeal decisions allowed on appeal where the council refused planning permission for major developments that do not adequately meet design and place shaping principles</u></p>	<p><u>The council to consider whether the policy requirements need to be review as part of a partial or full review of the Plan.</u></p>	<p><u>Strategic Policy D12.1 Delivering well designed and resilient neighbourhoods.</u></p> <p><u>Policy D12.2 Urban design</u></p> <p><u>Policy D12.3 Ensuring high quality design for all developments</u> <u>Policy HW10.2: Delivering healthy places.</u></p> <p><u>Strategic Policy T16.1 Sustainable Travel</u></p>
<p><u>Infrastructure</u></p> <p><u>To ensure that environmental, social and physical infrastructure is managed and</u></p>	<p><u>Delivery of infrastructure projects identified in the Infrastructure Delivery Plan (short,</u></p>	<p><u>Number of infrastructure projects delivered in the first five years of</u></p>	<p><u>Phasing of key infrastructure not being delivered.</u></p>	<p><u>Council to consider whether there are any obstacles to the delivery of infrastructure in the</u></p>	<p><u>Policy IN14.2 Social and community infrastructure</u></p>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency/ Action</u>	<u>Local Plan policy</u>
<u>delivered to support demographic change.</u>	<u>medium and long term as identified in the IDP).</u>	<u>the plan and plan period.</u>		<u>first 5 years and later years of the Plan, through annual reviews.</u> <u>Council to consider whether the policy requirements need to be reviewed as part of a partial or full review of the Plan.</u>	
<u>Design</u> <u>To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed and accessible, which promote and enhance a sense of place and distinctiveness.</u>	<u>Appeal decisions</u> <u>Increase in number of major schemes reviewed by the Design Review Panel at pre – application stage.</u>	<u>n/a</u>	<u>Decisions allowed on Appeal where the council refused planning permission on design grounds.</u>	<u>The council to consider whether all the design policies requirements need to be reviewed as part of a full or partial review of the Local Plan.</u>	<u>Strategic Policy D12.1 Delivering well designed and resilient neighbourhoods.</u>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency/ Action</u>	<u>Local Plan policy</u>
<p><u>Education and skills</u></p> <p><u>To ensure the education and skills provision meets the needs of Merton residents existing and future labour market and improves life chances for all, including people with disabilities and Black, Asian and other minority ethnic groups.</u></p>	<p><u>Number of new schools developed to meet pupil needs.</u></p> <p><u>Number of 16- 24-year-olds in training or apprenticeships or work programmes.</u></p> <p><u>Number of local people employed or in training as part of large or regeneration developments.</u></p>	<p><u>Delivery of necessary education floorspace through approved applications.</u></p> <p><u>Yearly increase in the number of apprenticeships or work programmes.</u></p> <p><u>All large and regeneration developments to provide local people with employment and/or training opportunities.</u></p>	<p><u>Appeal decisions allowed where the council refused planning permission for the use or redevelopment of educational facilities.</u></p> <p><u>Decision allowed on Appeal where the council refused planning permission for the extension or expansion of existing educational facilities.</u></p>	<p><u>Council to consider the circumstances of the decision that have led to a trigger.</u></p> <p><u>Council to consider whether a review of the policy requirements need to be reviewed as part of a partial or full review of the Plan.</u></p>	<p><u>Policy IN14.2 Social and community infrastructure</u></p> <p><u>Policy TC13.9 Culture, arts and tourism development</u></p>
<p><u>Local employment</u></p>					<p><u>Strategic policy EC13.1 Promoting economic growth</u></p>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency/ Action</u>	<u>Local Plan policy</u>
<p><u>To develop and maintain a healthy labour market.</u></p>	<p><u>Number of people unemployed.</u></p> <p><u>Number of new jobs created.</u></p> <p><u>No loss in scattered employment sites in accordance with policy.</u></p>	<p><u>% of people unemployed lower than regional and national averages.</u></p> <p><u>Increase in number of new jobs created.</u></p>			<p><u>and successful high streets</u></p> <p><u>Policy EC13.2 Business locations in Merton</u></p> <p><u>Policy EC13.3 Protection of scattered employment sites</u></p> <p><u>Policy EC.13.4 Local Employment Opportunities</u></p>
<p><u>Economic growth and town centres</u></p> <p><u>To increase the vitality and viability of existing town centres, local centres and parades.</u></p> <p><u>To ensure a sufficient supply premise to meet demand for</u></p>	<p><u>Annual review of the shopping survey to measure the retail vacancy rate in Merton's town centres.</u></p> <p><u>Measure loss of industrial and warehousing floorspace within</u></p>	<p><u>Maintain the retail vacancy rate below national and regional averages in Merton's town centres.</u></p> <p><u>Maintain the industrial vacancy rate below national</u></p>	<p><u>Increase Merton's retail / industrial vacancy rate in greater proportion than the London or national average when measured annually over three years</u></p>	<p><u>Council to consider the circumstances of the decision that have led to a trigger.</u></p> <p><u>Council to consider whether a review of the policy requirements need to be reviewed as</u></p>	<p><u>Strategic policy EC13.1 Promoting economic growth and successful high streets</u></p> <p><u>Policy TC 13.5 Merton's town centres and neighbourhood parades</u></p>

<u>Thematic area</u>	<u>Monitoring indicator</u>	<u>Target (if applicable)</u>	<u>Trigger for action</u>	<u>Contingency/ Action</u>	<u>Local Plan policy</u>
<u>industry, logistics and services.</u>	<u>Strategic Industrial Locations.</u>	<u>and regional averages.</u> <u>No net loss of Strategic Industrial Locations.</u>	<u>Loss of Strategic Industrial Locations over three years</u>	<u>part of a partial or full review of the Plan.</u>	<u>Policy TC 13.6 Development of town centre type uses outside town centres</u> <u>Policy TC13.7 Protecting corner / local shops</u>

MM Appendix 4 – after page 665 (MM18.1)

Core Planning Strategy (2011) policies replaced by the forthcoming Local Plan

<u>Core Planning Strategy policies</u>	<u>Replaced by forthcoming Policies in the Local Plan (submitted 2nd December 2021)</u>
<u>Issues and options.</u>	<u>Good growth chapter</u>
<u>Merton's Core Strategy Spatial Vision.</u>	<u>Chapter 01c: Urban development objectives and vision.</u>
<u>Key Diagram (Figure 8.1 Key Diagram).</u>	<u>Figure 1: Merton's spatial strategy.</u>
<u>Policy CS 1 Colliers Wood.</u>	<u>Policy N3.1: Colliers Wood.</u>
<u>Policy CS 2 Mitcham Town Centre.</u>	<u>Policy N4.1 Mitcham.</u>
<u>Policy CS 3 Morden Town Centre.</u>	<u>Policy N5.1; Morden.</u>
<u>Policy CS 4 Raynes Park Local Centre.</u>	<u>Policy N6.1: Raynes Park.</u>
<u>Policy CS 5 Wandle Valley.</u>	<u>Policy O15.6 Wandle Valley Regional Park.</u>
<u>Policy CS 6 Wimbledon Town Centre.</u>	<u>Policy N9.1: Wimbledon.</u>
<u>Policy CS 7 Centres.</u>	<u>Strategic policy EC13.1 Promoting economic growth and successful high streets.</u>
<u>Policy CS 8 Housing Choice.</u>	<u>Strategic Policy H11.1 Housing choice</u>
<u>Policy CS 9 Housing Provision.</u>	<u>Strategic Policy H11.2 Housing provision</u>
<u>Policy CS 10 Accommodation for Gypsies and Travellers.</u>	<u>Policy No. H11.6 Accommodation for Gypsies and Travellers.</u>
<u>Policy CS 11 Infrastructure.</u>	<u>Strategic policy IN 14.1 Infrastructure.</u>
<u>Policy CS 12 Economic Development.</u>	<u>Strategic policy EC13.1 Promoting economic growth and successful high streets.</u>
<u>Policy CS 13 Open space, nature conservation, leisure and culture.</u>	<u>Strategic Policy O15.1 Open Space, Green Infrastructure and Nature Conservation.</u>
<u>Policy CS 14 Design.</u>	<u>Strategic Policy D12.1 Delivering well-designed and resilient neighbourhoods.</u>
<u>Policy CS 15 Climate Change.</u>	<u>Strategic Policy CC2.1: Promoting Sustainable Design to Mitigate and Adapt to Climate Change.</u>
<u>Policy CS 16 Flood Risk Management.</u>	<u>Strategic Policy F15.7 Flood Risk Management and Sustainable Drainage.</u>
<u>Policy CS 17 Waste Management.</u>	<u>Strategic Policy W14.4 Waste Management.</u>

<u>Core Planning Strategy policies</u>	<u>Replaced by forthcoming Policies in the Local Plan (submitted 2nd December 2021)</u>
<u>Policy CS 18 Active Transport.</u>	<u>Strategic Policy T16.1 Sustainable Travel.</u>
<u>Policy CS 19 Public Transport.</u>	<u>Strategic Policy T16.1 Sustainable Travel.</u>
<u>Policy CS 20 Parking, Servicing and Delivery.</u>	<u>Strategic Policy T16.1 Sustainable Travel.</u>
<u>Chapter 27 Delivery and Implementation (Delivery of the Spatial Strategy and Core Policies).</u>	<u>Main Modification Chapter 17: Monitoring policy 17.1 and monitoring framework</u>
<u>Chapter 28 Monitoring Framework.</u>	<u>Main Modification Chapter 17: Monitoring policy 17.1 and monitoring framework</u>

Sites and Policies Plan (2014) policies replaced by the forthcoming Local Plan

<u>Sites and Policies Plan policies</u>	<u>Replaced by forthcoming Policies in the Local Plan (submitted 2nd December 2021)</u>
<u>DM R1 Location and scale of development in Merton's town centres and neighbourhood parades.</u>	<u>Policy TC 13.5 Merton's town centres and neighbourhood parades.</u>
<u>DM R2 Development of town centre type uses outside town centres.</u>	<u>Policy TC 13.6 Development of town centre type uses outside town centres.</u>
<u>DM R3 Protecting corner/ local shops.</u>	<u>Policy TC13.7 Protecting corner / local shops</u>
<u>DM R4 Protection of shopping facilities within designated shopping frontages.</u>	<u>Policy TC 13.5 Merton's town centres and neighbourhood parades.</u>
<u>DM R5 Food and drink / leisure and entertainment uses.</u>	<u>Policy TC13.8 Food and drink / leisure and entertainment.</u>
<u>DM R6 Culture, arts and tourism development.</u>	<u>Policy TC13.9 Culture, arts and tourism development.</u>
<u>DM R7 Markets.</u>	<u>Policy not taken forward.</u>
<u>DM H1 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system.</u>	<u>Policy No. H11.4 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system.</u>
<u>DM H2 Housing mix.</u>	<u>Policy No. H11.3 Housing mix</u>

<u>Sites and Policies Plan policies</u>	<u>Replaced by forthcoming Policies in the Local Plan (submitted 2nd December 2021)</u>
<u>DM H3 Support for affordable housing.</u>	<u>Policy No. H11.1 Housing choice</u>
<u>DM H4 Demolition and redevelopment of a single dwelling house.</u>	<u>Policy not taken forward.</u>
<u>DM H5 Student housing, other housing with shared facilities and bedsits.</u>	<u>Policy No. H11.5 Student Housing, other housing with shared facilities and bedsits</u>
<u>DM C1 Community facilities.</u>	<u>Policy IN14.2 Social and Community Infrastructure</u>
<u>DM C2 Education for children and young people.</u>	<u>Policy IN14.2 Social and Community Infrastructure</u>
<u>DM E1 Employment areas in Merton.</u>	<u>Policy EC13.2 Business locations in Merton</u>
<u>DM E2 Offices in town centres.</u>	<u>Policy EC13.2 Business locations in Merton</u>
<u>DM E3 Protection of scattered employment sites.</u>	<u>Policy EC13.3 Protection of scattered employment sites</u>
<u>DM E4 Local employment opportunities.</u>	<u>Policy EC.13.4 Local Employment Opportunities</u>
<u>DM O1 Open space.</u>	<u>Policy O15.2 Open Space and Green Infrastructure</u>
<u>DM O2 Nature conservation, trees, hedges and landscape features.</u>	<u>Policy O15.3 Biodiversity and Access to Nature</u> <u>Policy O15.4 Protection of Trees</u>
<u>DM D1 Urban design and the public realm.</u>	<u>D12.2 Urban design</u>
<u>DM D2 Design considerations in all developments.</u>	<u>D12.3 Ensuring high quality design for all developments</u>
<u>DM D3 Alterations and extensions to existing buildings.</u>	<u>Policy D12.4 Alterations and extensions to existing buildings</u>
<u>DM D4 Managing heritage assets.</u>	<u>Policy D12.5 Managing heritage assets</u>
<u>DM D5 Advertisements.</u>	<u>Policy D12.7 Advertisements</u>
<u>DM D6 Telecommunications.</u>	<u>Policy D12.8 Digital infrastructure</u>
<u>DM D7 Shop front design and signage.</u>	<u>Policy D12.9 Shop front design and signage</u>
<u>DM EP1 Opportunities for decentralised energy networks.</u>	<u>Not taken forward.</u>
<u>DM EP2 Reducing and mitigating noise.</u>	<u>Policy P15.10 Improving Air Quality and Minimising Pollution</u>
<u>DM EP3 Allowable solutions.</u>	<u>Not taken forward</u>

<u>Sites and Policies Plan policies</u>	<u>Replaced by forthcoming Policies in the Local Plan (submitted 2nd December 2021)</u>
<u>Policy DM EP4 Pollutants.</u>	<u>Policy P15.10 Improving Air Quality and Minimising Pollution</u>
<u>DM F1 Support for flood risk management.</u>	<u>Policy F15.8 Managing Local Flooding</u>
<u>DM F2 Sustainable urban drainage systems (SUDS) and; wastewater and water infrastructure.</u>	<u>Policy F15.9 Sustainable Drainage Systems (SUDS)</u>
<u>DM T1 Support for sustainable transport and active travel.</u>	<u>Policy T16.2 Prioritising active travel choices</u>
<u>DM T2 Transport impacts of development.</u>	<u>Policy T16.3 Managing the transport impacts of development</u>
<u>DM T3 Car parking and servicing standards.</u>	<u>T16.4 Parking, deliveries and servicing</u>
<u>DM T4 Transport infrastructure.</u>	<u>T16.5 Supporting transport infrastructure</u>
<u>DM T5 Access to the Road Network.</u>	<u>Not taken forward</u>
<u>Appendices (A –L).</u>	<u>Chapter 17: Appendices</u>
<u>Policies Map (2014)</u>	<u>Polices Map (submitted 2022)</u>

MM Appendix 5 – after page 602 (MM18.1a)

Metropolitan Open Land (MOL) – boundary amendments and exceptional circumstances

The following pages set out details of all the boundary amendments to Metropolitan Open Land (MOL), in accordance with national policy (NPPF 2021 para 140) and London Plan 2021 (Policy G3).

Relevant policies for MOL are set out in Chapter 15 (Strategic Policy O15.1 and Policy O15.2).

The new boundaries of all MOL sites are illustrated on the Policies Map.

MOL-01 – Cannon Hill

Site Description (including relevant physical boundary features):

Cannon Hill MOL is located on the border of the Morden and Raynes Park Neighbourhoods. It includes Cannon Hill Common, Joseph Hood Recreation Ground, Martin Way Allotments and a number of sport and recreation facilities.

The physical boundaries include:

- North – Bushey Road,
- East – The David Lloyd building footprint, fencing and rear of residential properties surrounding Martin Way Allotments and Joseph Hood Recreation Ground.
- South – Cannon Hill Lane, Parkway and the fenced rear boundaries of residential properties.
- West – Fenced rear boundaries of residential properties facing Grand Drive to the west.

Description of MOL boundary change (including any exceptional circumstances):

To realign the MOL boundary with the current building line, which has changed through approved planning applications since the 2014 Sites and Policies Map was adopted. This boundary amendment is made to accurately reflect what is built on site, namely the outline of the David Lloyd building along with associated entrances and exits to the outdoor sporting features, fencing to the north and landscaping to the east.

The remainder of the site continues to meet the MOL criteria 1, 2 and 3 from the London Plan and maintains openness as detailed in the NPPF.

There would be no harm to the wider MOL function through the removal of this building. In fact, the building itself is deemed to harm the openness of wider the Cannon Hill MOL.

Relevant Planning Application: 19/P3979.

This boundary change results in an addition of 0.54ha MOL (from 55.25ha to 55.79ha), which is a 0.98% change.

Map illustrating boundary change:



MOL-02 – Wimbledon Park

Site Description (including relevant physical boundary features):

Wimbledon Park MOL is located within the Wimbledon Neighbourhood. It includes the publicly accessible Wimbledon Park (within the LB Merton boundary), the Wimbledon Park Golf Course and Club, The Wimbledon Club sports club, Wimbledon Park Lake and part of the All England Lawn Tennis Club (AELTC).

The physical boundaries include:

- North – It should be noted that as Wimbledon Park is located in the boroughs of both LB Merton and LB Wandsworth, the northern boundary of this MOL site in Merton is the borough boundary, which is not a physical boundary.
- East – fenced landscaping along the District Underground Line.
- South – Home Park Road and the fenced rear boundaries of residential properties.
- West – Church Road.
- The smaller area of Wimbledon Park MOL on the site of the AELTC site is bound by the rear fenced boundaries of residential properties to the north and west, operational buildings to the south, and the boundary of Aorangi Terrace (also known as Murray Mound) to the east.

Description of MOL boundary change (including any exceptional circumstances):

To remove a small area on the AELTC site which contains buildings and other specific features that are not considered to contribute to the openness of the Wimbledon Park MOL.

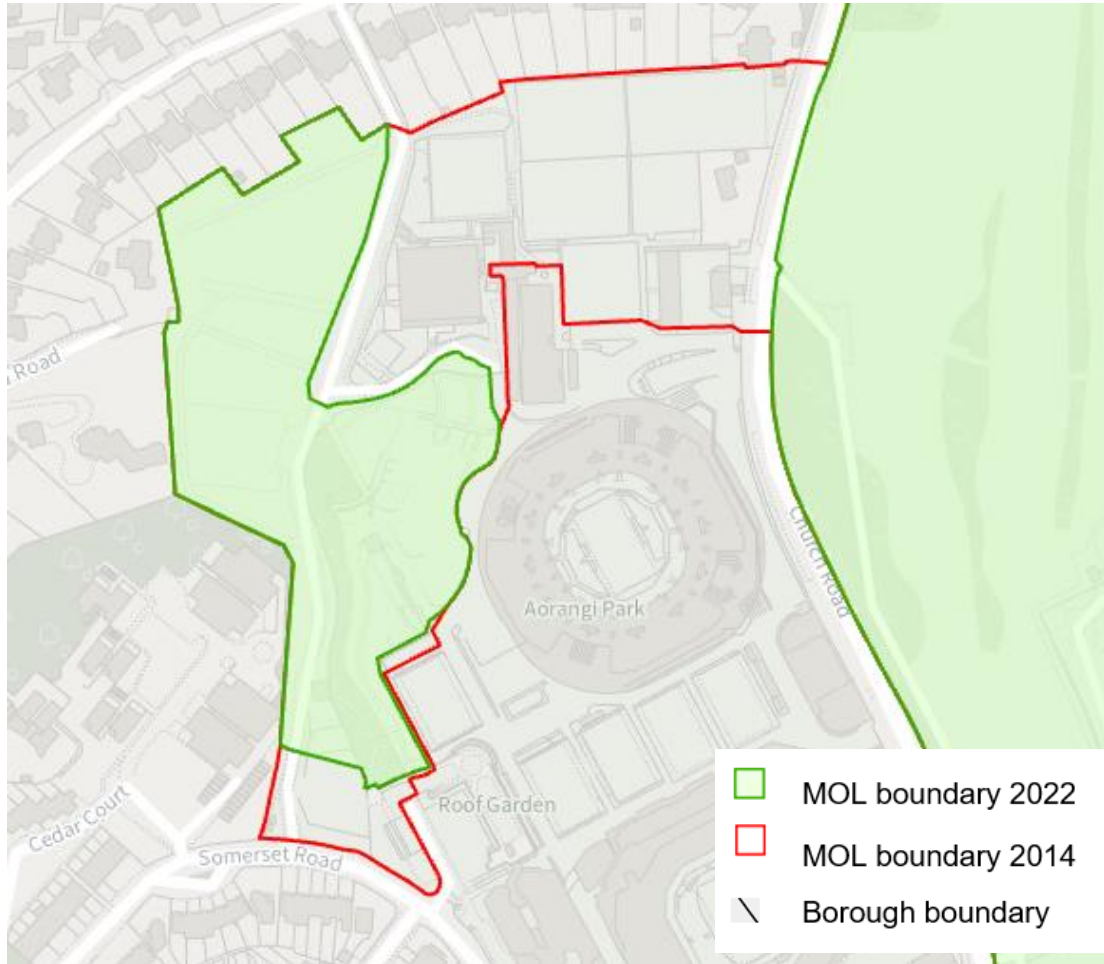
The Wimbledon Championships event is of national and international significance, in sporting, economic and cultural terms. The Wimbledon Park MOL comprises the entirety of Wimbledon Park, to the east of Church Road, in addition to a small area to the north of the AELTC site. This area includes some practice courts and buildings, but is not connected either visually or physically, to the park, with clear boundaries set by Church Road. The site owners have provided evidence which sets out a long-term vision for The Wimbledon Championships at this location, which includes the relocation of the Qualifying Event and enhancement of the current site to create a more user-friendly experience and to maintain its position as one of the best sporting events in the World. This part of MOL does not meet the strategic designation criteria and it is considered there would be no harm to the wider MOL function of Wimbledon Park, as the land is clearly separated from Wimbledon Park, visually and physically.

The remaining areas of the site, namely Wimbledon Park and the area known as Aorangi Terrace (Murray Mound) still meet MOL criteria 1, 2 and 4 and maintain openness as detailed in the NPPF.

The physical boundaries are clear and defensible and capable of enduring beyond the Plan period, as the Wimbledon Championships is a long lasting international sporting event. The council considers that exceptional circumstances exist for this part of the MOL to be removed.

This boundary change results in a reduction of 2.5ha (from 52.5ha to 50ha), which is a 4.76% change.

Map illustrating boundary change:



MOL-03 – Lower Morden

Site Description (including relevant physical boundary features):

The Lower Morden MOL is located within the Morden Neighbourhood.

The physical boundaries include:

- North – fenced residential properties on both sides of Arthur Road, along Marina Avenue, Tennyson Avenue, Westway and Meadowsweet Close.
- East – Grand Drive, fenced residential properties off St Catherine’s Close, Derwent Road, Coniston Close and Buttermere Close, Eveline Day Nursery, St John Fisher Primary School and Lower Morden Lane.
- South – Garth Road, landscaped edge of Morden and Sutton Joint Cemetery abutting built form of adjoining industrial area.
- West – the western boundary primarily follows the pedestrian walkways which provide a link from Trafalgar Avenue, along the rear of the industrial area, cemetery and equestrian centre, up and around Sir Joseph Hood Memorial Playing Fields, along the Beverley Brook. It should be noted that this also forms the borough boundary with LB Sutton.

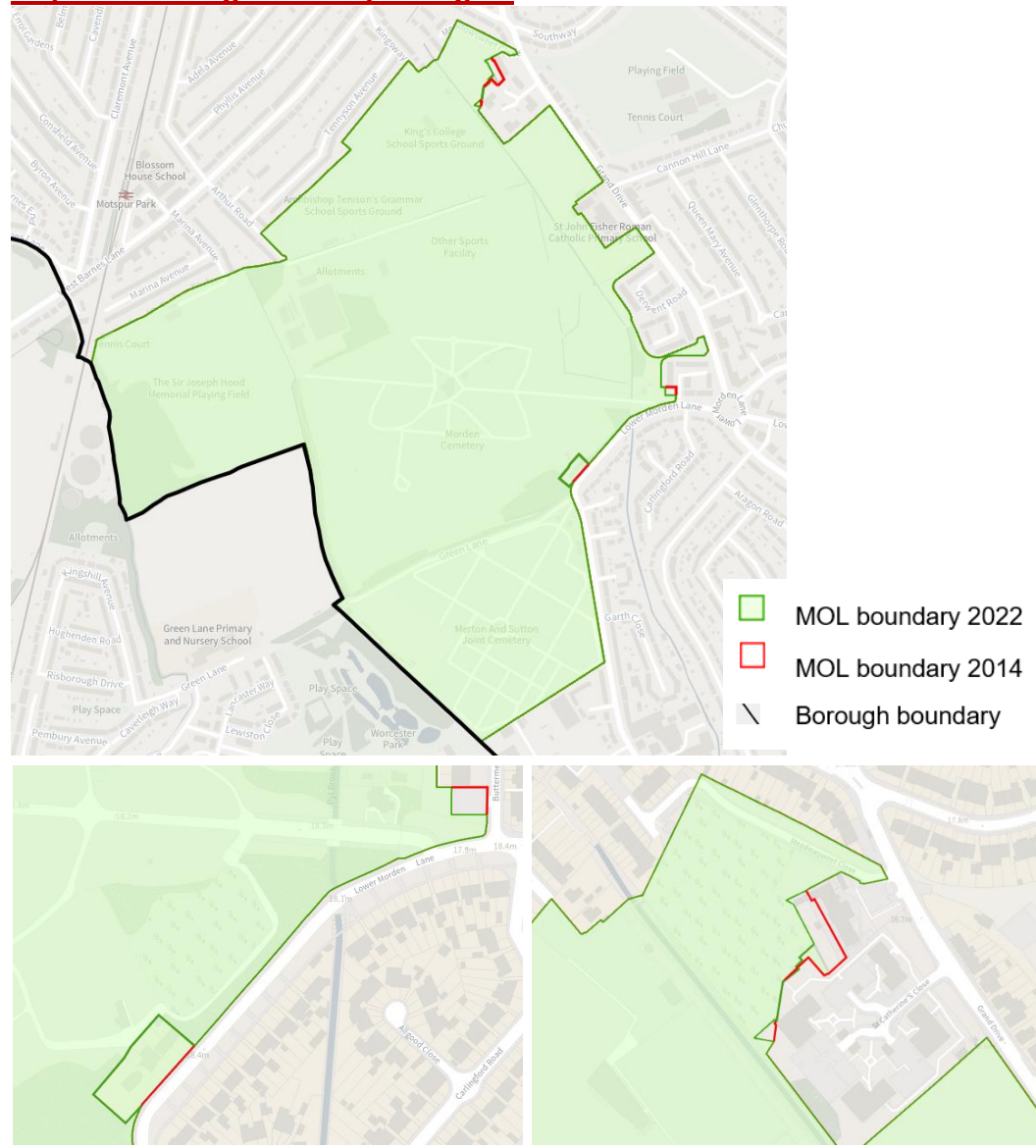
Description of MOL boundary changes (including any exceptional circumstances):

There are four separate boundary changes:

1. Land off Meadowsweet Close. A minor amendment is proposed to realign the MOL boundary with the current building line which has changed since the 2014 Policies Map was adopted. The site is physically and visually separated, with a nursery building, outdoor play area and site boundary fence offering no connections to the MOL.
2. Correction to cartographic boundary error near Eveline Day Nursery & St Catherine’s Close.
3. Land off Buttermere Close. A minor boundary amendment is proposed to realign the MOL boundary and remove a residential carpark. The carpark is ancillary to the adjoining residential units and is not linked to the cemetery. It does not contribute to the openness of the Lower Morden MOL. This appears to be an error in the 2014 Policies Map.
4. Proposed boundary amendments to remove four houses next to the cemetery from Lower Morden MOL. This is an error from the 2014 Policies Map. While the houses are directly adjacent to the cemetery, they are freehold properties separately owned and are not related to the cemetery. They do not contribute to the openness of the MOL.

These boundary changes represent a reduction of 0.2ha (from 81ha to 80.8ha), which is a 0.25% change.

Maps illustrating boundary changes:



MOL-04 – Beverley Brook / A3

Site Description (including relevant physical boundary features):

The Beverley Brook/A3 MOL is located within the Raynes Park Neighbourhood. It includes several sports & recreation grounds and part of the Malden Golf Course.

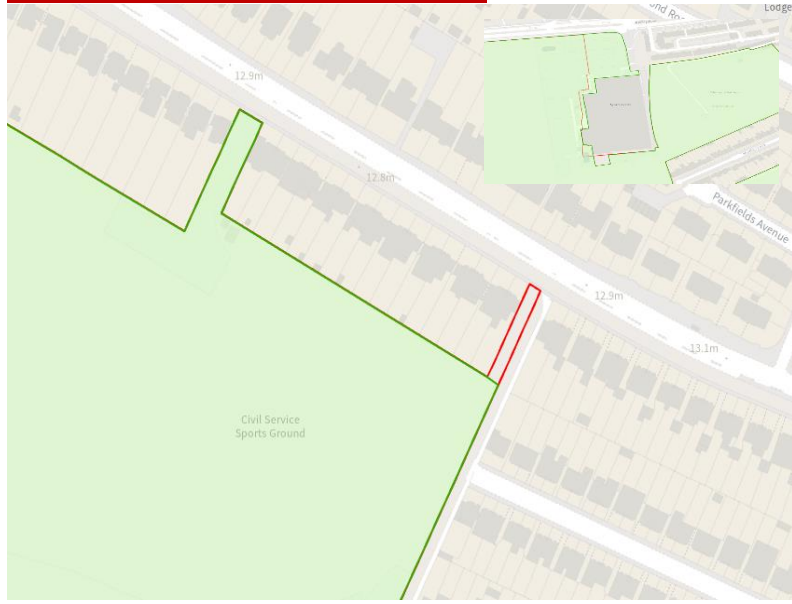
The physical boundaries include:

- North – Fenced residential properties off Somerset Avenue, Camberley Avenue, Coombe Lane, Coombe Gardens and Beverley Way.
- East – The A3, fenced residential properties off Aboyne Drive and Taunton Avenue.
- South – The built form of the adjoining industrial area and the landscaped edge of the overground railway line.
- West – The A3 and the Beverley Brook, which also forms the borough boundary with LB Kingston.

Description of MOL boundary change (including any exceptional circumstances):

This part of the site appears to have been included as MOL in error in the 2014 Sites and Policies Plan. It does not meet the MOL criteria set out in the London Plan and is therefore recommended to be removed. The site is privately owned, is physically separated from the adjoining MOL, does not offer sports, leisure, recreation, art or cultural activities and does not contain features or landscapes of a national or metropolitan value.
These boundary changes represent a reduction of 0.02ha (from 28.96ha to 28.94ha), which is a 0.07% change.

Map illustrating boundary change:



MOL-05 – Copse Hill

Site Description (including relevant physical boundary features):

The Copse Hill MOL is located within the Wimbledon Neighbourhood. It includes Morley Park and other green spaces around the Atkinson Morley and former Wilson Hospital residential developments.

The physical boundaries include:

- North – Built form at Atkinson Morley and the former Wilson Hospital.
- East – Fenced residential properties off Heights Close, Cottenham Place and Prospect Place.
- South – Cottenham Park Road.
- West – Primary School and fenced residential properties off Melville Avenue and Burdett Avenue.

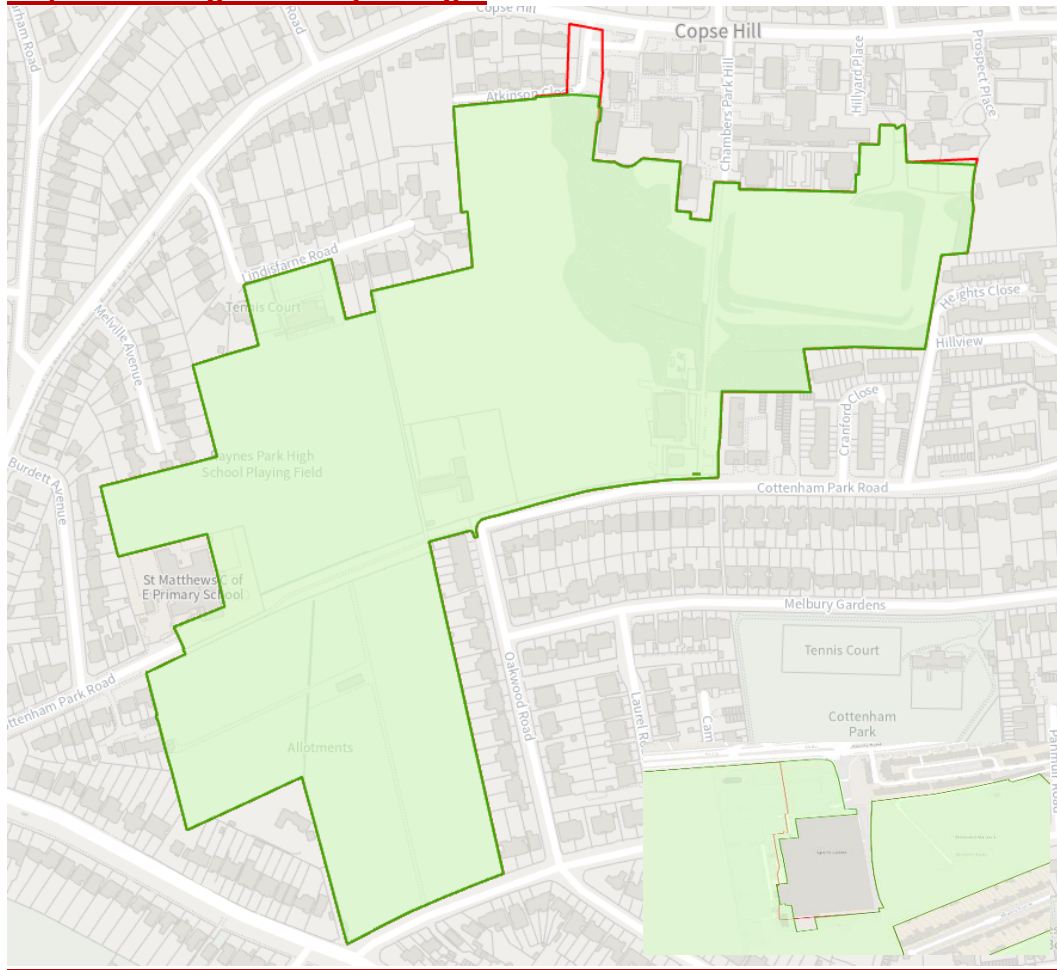
Description of MOL boundary change (including any exceptional circumstances):

Boundary changes are proposed to reflect the approved planning applications and new built form for this site. The built form of the new developments at Atkinson Morley and the former Wilson Hospital sites set the physical boundaries of the northern edge of this MOL.

Relevant planning applications: 13/P2722 and 16/P4853.

These boundary changes represent a reduction of 0.1ha (from 16.1ha to 16ha), which is a 0.62% change.

Map illustrating boundary change:



MOL-12 – Wimbledon Common

Site Description (including relevant physical boundary features):

The Wimbledon Common MOL is located within the Wimbledon Neighbourhood. It includes the Royal Wimbledon Golf Club, Wimbledon Common, and various sports, leisure and recreation facilities.

The physical boundaries include:

- North – Borough boundary with LB Wandsworth.
- East – The A219.
- South – Southside Common and fenced residential properties.
- West – The A3.

Description of MOL boundary change (including any exceptional circumstances):

No boundary changes.

Map illustrating boundary change:

N/A

MOL-14 – Mitcham Common

Site Description (including relevant physical boundary features):

The Mitcham Common MOL is located in the Mitcham Neighbourhood. It includes Mitcham Golf Club, Mitcham Common, Cranmer Nature Reserve, and various sports, leisure and recreation facilities.

The physical boundaries include:

- North – Commonside East.
- East – Borough boundary with LB Croydon.
- South – Borough boundary with LB Sutton.
- West – Railway and Tram lines, A239.

Description of MOL boundary change (including any exceptional circumstances):

No boundary changes

Map illustrating boundary change:

N/A

MOL-16 – Morden Park

Site Description (including relevant physical boundary features):

The Morden Park MOL is located within the Morden Neighbourhood. It includes Morden Cricket Club, Morden Park and other recreation and leisure facilities.

The physical boundaries include:

- North – Railway line and rear fenced residential properties off Hillcross Avenue.
- East – A24.
- South – Lower Morden Lane.
- West – Residential properties off Hillcross Avenue, Lower Morden Garden Centre.

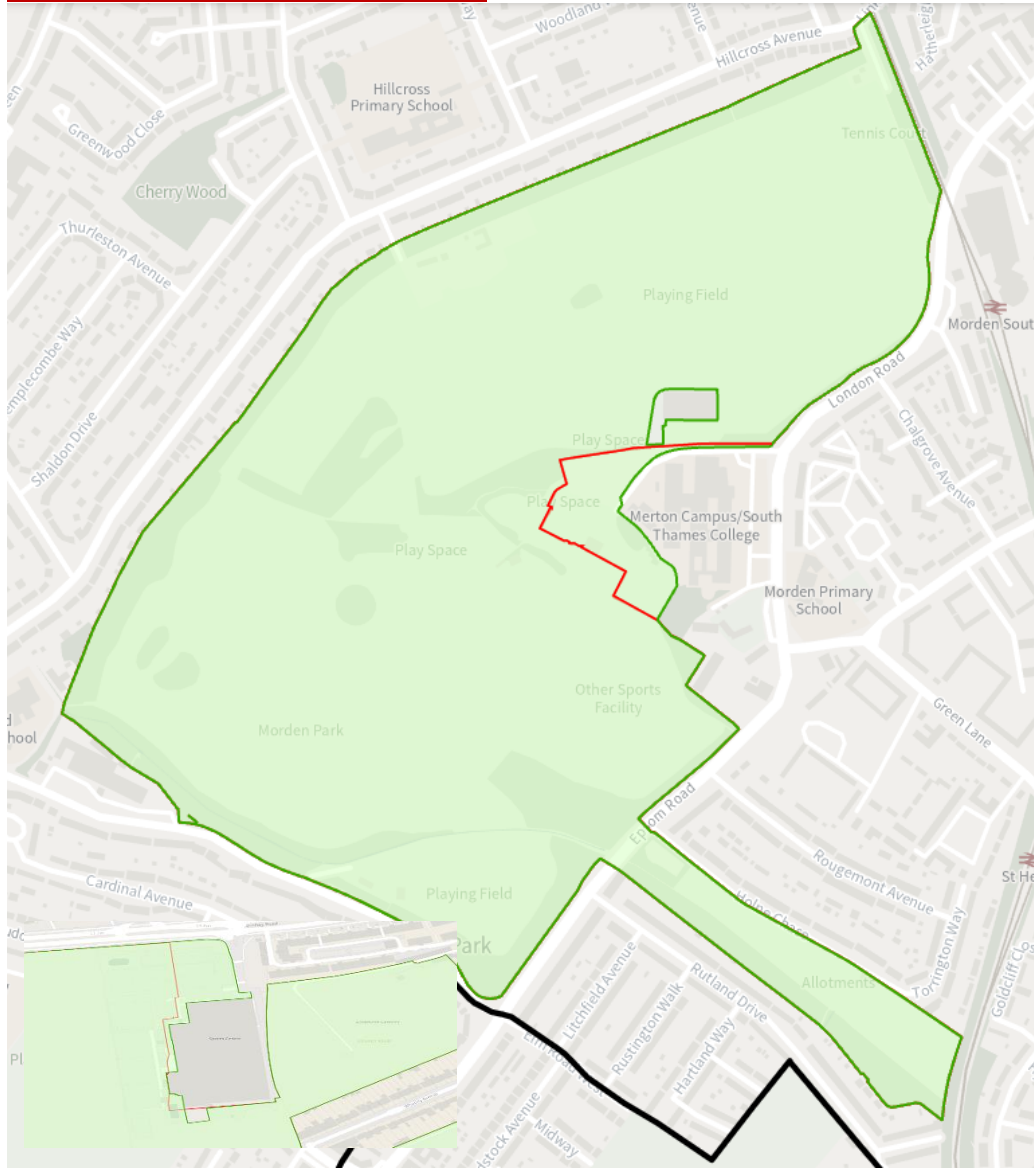
Description of MOL boundary change (including any exceptional circumstances):

Boundary amendment to the former and new Morden Leisure Centre site and minor extension to the MOL boundary to include the adjoining carpark, play area and other ancillary features to the park. This proposed amendment is to reflect the location of the new Morden Leisure Centre, approved with a MOL land swap through a planning application and ensure all areas of Morden Park that meet the MOL criteria are included for protection. The former leisure centre building has been demolished and this area has now been restored for nature conservation purposes.

Relevant planning application: 16/P0882

These boundary changes represent an addition of 1.56ha MOL (from 73.24ha to 74.8ha), which is a 2.13% change.

Map illustrating boundary change:



MOL-18 – Wandle Valley

Site Description (including relevant physical boundary features):

The Wandle Valley MOL stretches across a large area of the borough, through the Mitcham, Morden, Colliers Wood and Wimbledon Neighbourhoods.

The physical boundaries include:

- North – Borough boundary with LB Wandsworth.
- South – Borough boundary with LB Sutton.
- East and West – The MOL follows the River Wandle and broadly encompasses the Wandle Valley Regional Park sites, which stretch across a thin corridor from north to south of the borough.

Description of MOL boundary change (including any exceptional circumstances):

1. 222 High Street, Colliers Wood. The removal of this retail property and adjacent car park is proposed and necessary to correct an error in the 2014 MOL boundary. This site does not form part of the Wandle Valley MOL corridor and is an anomaly that needs to be corrected. The built form and ancillary carpark are clearly separated from the park and do not contribute to the openness of the MOL.

2. Tooting and Mitcham Hub. As demonstrated through the approved planning application, this site meets very special circumstances and MOL is to be removed as per the granted permission and S106 agreement. The approved residential development will not contribute to the openness of the MOL and will act as a physical barrier to the surrounding area.

Relevant planning application: 19/P4094

These boundary changes represent a reduction of 0.3ha (from 103ha to 102.7ha), which is a 0.29% change.

Maps illustrating boundary change:

